

**SummitAlliance Capital Management, LLC**  
**SEC Registration # 801-60900**  
*Registered Investment Adviser*

14785 Preston Road  
Suite 1000  
Dallas, Texas 75254

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This brochure provides clients with information about the SummitAlliance Capital Management, LLC and the Multiple Strategy Portfolio Program that should be considered in determining whether participation in the Program is suitable. This information has not been approved or verified by any governmental authority.

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**Schedule H to Form ADV - Part II**  
September, 2009



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**I. CLIENT'S INDIVIDUAL INVESTMENT ADVISOR**

The SummitAlliance Capital Management, LLC (SummitAlliance) *Multiple Strategy Portfolio* Program (the "Program") is offered through Registered Investment Advisors and the investment professionals who represent them (each, an "Advisor"), as the individual investment advisor for the Client. Clients may also be referred to SummitAlliance pursuant to section 206(4)-3 of the Investment Advisor's Act of 1940. The Advisor evaluates the Client's investment needs and objectives and consults with the Client concerning the Client's participation in the Program. SummitAlliance is not affiliated with the Advisor, unless the advisor is an investment advisor representative of SummitAlliance Advisors, LLC or the solicitor is a representative of SummitAlliance Securities, LLC.

The Advisor provides the specific advice to the Client concerning the choice of proposals that SummitAlliance makes to Client. The Advisor and/or the Client (depending upon the specific form of Client Services Agreement entered into between the Advisor and the Client) have full discretion to choose the proposal and the associated Statement of Investment Policy, and will at all times have the opportunity to update SummitAlliance on changes in Client financial or personal circumstances that impact the investment strategy SummitAlliance is managing on behalf of that Client, and will at all times have the discretion to restrict SummitAlliance's use of certain asset classes or investment vehicles deemed inappropriate by Client or Advisor.

The Advisor reviews SummitAlliance's portfolio decisions on behalf of the Client and makes or recommends investment decisions to the Client based on such analysis and in accordance with the Statement of Investment Policy.

**II. SUMMITALLIANCE CAPITAL MANAGEMENT, LLC**

SummitAlliance is a registered investment advisor with the Securities and Exchange Commission (SEC), and provides investment management services through other advisors to those advisors' clients. SummitAlliance is the Sponsor of the Program, and works with Advisor to implement the Program for their clients. As part of its Program services, SummitAlliance is responsible for account administration, fee billing, and performance reporting, and has developed internet-based software which provides the Advisor with the capability of directly monitoring Client accounts, downloading information

concerning changes in the Program, and accessing current information relating to the Program.

SummitAlliance requires that employees involved in delivering investment advice or involved in portfolio management decisions have (1) a FINRA Series 7 General Securities License and a Series 65 Financial Advisor License (or be exempt) as required by any state in which the individual is to be licensed, and (2) a bachelor's degree and/or professional designation such as CFA, CFP, CMT, or CIMA. All members of the Investment Committee shall have no less than three year's investment industry experience.

The following lists the principal officers of SummitAlliance:

Douglas W. Gill, Chief Executive Officer and Co-Chief Investment Officer  
Christopher K. High, Executive Vice President and Co-Chief Investment Officer  
Stan R. Hall, Chief Compliance Officer  
Brandon K. Sherbert, Senior Vice President and Director of Advisory Services  
Scott M. Zachary, Vice President and Director of Investment Management

Set forth below is a description of the Program.

**III. PROGRAM**

**Mutual Fund, Exchange Traded Fund (ETF) and Variable Annuity Accounts**

SummitAlliance creates customized asset allocation portfolios based on Client Profile Data. The Program makes use of vehicles such as open-end mutual funds, exchange traded funds, and variable annuity sub-accounts. Additionally, SummitAlliance has developed a process for intelligently re-balancing Client portfolios using Exchange Traded Funds (ETFs), which are passively managed baskets of securities, tracking a wide variety of broad-market indexes, that are

traded as individual securities on a national exchange; or to variable annuity sub-accounts with certain variable annuity issuers, that is based on Client needs. Each of the mutual funds used in the Program is either a no-load mutual fund or a mutual fund that may be purchased through the Program at net asset value and without sales charges. Variable annuity accounts are subject to the terms and conditions of the prospectus delivered to the Client by the variable annuity issuer, and may or may not involve the payment of a commission to the Advisor or a related party by the variable annuity issuer. The Program is designed as a means for the Advisor to tailor the management of the Client's assets to the Client's individual needs.

Mutual funds, ETFs, variable annuity sub-accounts, and variable annuity issuers may be added or deleted from the Program from time to time at SummitAlliance's sole discretion. SummitAlliance monitors the performance of the mutual funds, ETFs and variable annuity sub-accounts in their Program and will periodically adjust and rebalance the portfolios in accordance with their investment strategies. Variable annuity sub-accounts available to the SummitAlliance will depend upon the individual variable annuity issuer selected by the Client and will be more fully described in the Prospectus delivered to the Client by the variable annuity issuer. SummitAlliance has no part in the selection these sub-accounts for any particular issuer, and SummitAlliance is unable to add or remove sub-accounts except as the list of sub-accounts is revised by each variable annuity issuer.

The standard minimum investment will generally be \$50,000 for mutual fund and variable annuity accounts, and \$100,000 for ETF accounts. SummitAlliance reserves the right, in its sole judgment, to accept certain investments below the standard minimum. Trading in all Client accounts is governed by written policy concerning the allocation of shares, a copy of which is available on request.

#### Multiple Manager Portfolio Accounts

SummitAlliance creates customized portfolios of individual securities. Portfolios strategies are recommended by way of Proposal based on Client Profile Data gathered by the Client's Advisor. SummitAlliance has contracted with a number of institutional investment management firms (the "Sub-advisors") to provide investment management services to Clients in accordance with the stated investment objectives. SummitAlliance will recommend allocations to one or more Sub-advisors currently available in the Program. Each Sub-advisor in the Program has been selected through a rigorous, proprietary due diligence process and manages a model (or basket of securities) representing a particular specialty such as International Equities or High-yield

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Bonds, by example. A copy of SummitAlliance's due diligence process is available to Advisors and Clients upon request. Varying percentages are allocated to these specialists as part of the overall strategy. SummitAlliance has discretion to remove from the Program those Sub-advisors that are deemed to under perform expectations. SummitAlliance periodically adds new Sub-advisors to the Program.

The Sub-advisors available in the Program represent a wide range of styles and philosophies and the use of several Sub-advisors in a portfolio strategy creates diversification and promotes stability of investment performance over time.

The process of gathering Client Profile Data is instrumental in identifying more clearly the Client's risk tolerance and rate of return objectives in the context of the Program. The Advisor must accurately convey information concerning the Client's investment experience, anticipated need for liquidity, potential timing of the need for retirement funds, and other investment needs and parameters to SummitAlliance. In turn, SummitAlliance will correctly map Client Profile Data to the appropriate mix of Sub-advisor models that most closely aligns with the Client's investment goals.

SummitAlliance provides the Advisor and Client with written descriptions of each of the Sub-advisors, including a brief history of each firm, an overview of the Sub-advisors' key investment management personnel, and, after an appropriate period from the commencement of the establishment of each model, a summary of the prior Program performance record of each Sub-advisor's model. These prior performance summaries are prepared on a uniform basis for all Sub-advisors. Client and the Advisor must review and understand each Sub-advisors investment style prior to making and accepting the SummitAlliance Proposal.

The Client and Advisor are free to accept or reject any Sub-advisor recommended by SummitAlliance, both at the time of the Proposal and at any time thereafter, and Client and Advisor are free to change allocations to Sub-advisors or mutual fund, ETF or variable annuity sub-account components of their portfolios. Client and Advisor may impose reasonable restrictions on the buying and selling of certain individual securities and/or asset classes. It is not anticipated that Clients will have any direct contact with Program Sub-advisors.

The standard minimum investment for Multiple Manager Portfolios will generally be \$200,000. SummitAlliance reserves the right, in its sole judgment, to accept certain investments below the standard minimum. In situations where SummitAlliance accepts an account below the standard minimum, the Client might not get the benefit of all available investments due to the practical

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limitation that smaller allocations of money can create. Trading in all Client accounts is governed by written policy concerning the allocation of shares, a copy of which is available on request.

#### General Information

SummitAlliance reviews the investment performance of all Client accounts quarterly. Clients are provided with monthly custodial reports from an independent third-party custodian and quarterly performance reports from the Sponsor. The monthly custodial reports include a listing of all investments in the client account, their current valuation, and a listing of all transactions occurring during the month. The quarterly performance reports include information concerning the allocation of the assets in the client account among various asset classes and the investment performance of the client account during the quarter.

Mutual fund and ETF investments made through the Program will be held in custody by a third party Custodian who will maintain the Client's account and effect transactions at the direction of SummitAlliance. Variable annuity sub-accounts will be held pursuant to the terms and conditions contained in a variable annuity Prospectus delivered to the Client by the specific variable annuity issuer.

All mutual funds, ETFs, and individual securities purchased for the Client's portfolio are held by an independent Custodian selected by the Client, and the Advisor. Each of the Client's investments are held by the Custodian in the Client's name in a separate account. The Client receives a copy of the Prospectus for each mutual fund, confirmations of each security purchased and sold for the Client's account (either separately or as part of the monthly custodial statement) and copies of all annual and periodic reports issued by the mutual funds and/or companies the Client holds, unless the Client has voluntarily elected to waive the right to such mailings. In addition, the Client retains all indicia of beneficial ownership, including, without limitation, all voting power and other rights as a security holder in each of the funds held for the Client, unless the Client has delegated voting to another party.

#### IV. TACTICAL OVERLAY

SummitAlliance has developed a proprietary tactical model (the Model) for measuring general market risk and for determining relative strength between different asset classes within the overall market. The Model is based on

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technical data that is readily available to all investors. Client and Advisor are free to accept or reject this service, both at the time of Proposal and any time thereafter. The Model is designed to reduce portfolio risk by shifting a portion of the Client's funds out of at-risk securities and into money market funds at times when the Model signals certain conditions exist in the market. In situations where the Model signals significant downside risk, the use of inverse index mutual funds and/or short selling of ETFs may be used to hedge such risk.

#### V. COMPENSATION

Clients participating in the Program pay the Advisor a fee for advisory services rendered. Clients pay SummitAlliance a Program Fee for participation in the Program. Due to the wide variety of compensation structures employed by Advisors, SummitAlliance allows the Advisor to determine the best way to administer the billing process. Depending on the administration instructions, these two fees might be combined to create a unified blended total fee and debited from Client assets as one fee, or they may be disclosed, calculated, and debited separately. The method of administration selected by the client's Advisor does not increase or decrease the total amount charged to the Client.

The Program Fee schedule listed below reflects SummitAlliance's standard Program Fee calculated as a percentage of the Client's assets invested in the Program. The actual Program Fee for any Client account is included in the Fee Schedule expressly set forth in the Client Management Agreement executed by the Client, Advisor and SummitAlliance.

SummitAlliance charges a single fee for custody/clearing, money manager, and platform fees. The following schedule does not include fees for the Tactical Overlay Program, which will be an additional 25 basis points. Also not included are other optional management overlay program fees. The financial advisor fee is set independently by each advisor and is not included in this schedule. Any number of Accounts for the benefit of one Portfolio Owner and family members may be linked together to meet a Platform Fee price break, all as based on Portfolio Owner directives.

#### SCHEDULE OF ACCOUNT FEES FOR UMA PORTFOLIOS\*

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Value Per Category	Program Fee for Securities			Program Fee for Securities	Program Fee for Mutual Funds	Program Fee For Core Market Exposure
	Domestic Equities, Int'l Equities, Individual Taxable Fixed Income			Individual Non-Taxable Fixed Income	Domestic Equity, Int'l Equity, Fixed Income, Variable Annuity Sub-account	Money Market Funds, Index Mutual Funds, Domestic ETFs, Int'l ETFs, Fixed Income ETFs
	A	B	C			
First \$500,000	1.00%	1.15%	1.30%	0.70%	0.60%	0.50%
Next \$500,000	1.00%	1.15%	1.30%	0.65%	0.50%	0.40%
Next \$1,000,000	1.00%	1.15%	1.30%	0.60%	0.30%	0.20%
Next \$3,000,000	0.95%	1.10%	1.25%	0.55%	0.30%	0.20%
\$5,000,001+	0.90%	1.05%	1.20%	0.45%	0.10%	0.10%

**SCHEDULE OF ACCOUNT FEES FOR TACTICAL STRATEGIES\***

Value Per Category	SummitAlliance Tactical Strategy		W.F. Donoghue Tactical Strategy		Emerald Asset Advisors Tactical Strategy		Advanced Financial Tactical Strategy	
	Tactical	VA	Tactical	VA	Tactical	VA	Tactical	VA
First \$250,000	0.80%	0.60%	0.85%	0.70%	0.95%	N/A	1.00%	1.00%
Next \$750,000	0.75%	0.60%	0.85%	0.70%	0.95%	N/A	1.00%	1.00%
\$1,000,001 +	0.70%	0.60%	0.85%	0.70%	0.95%	N/A	1.00%	1.00%

**SCHEDULE OF ACCOUNT FEES FOR MUTUAL FUND WRAP\***

Value Per Category	SummitAlliance Mutual Fund Wrap
First \$250,000	0.75%
Next \$750,000	0.70%
\$1,000,001 +	0.65%

**SCHEDULE OF ACCOUNT FEES FOR OVERLAY SERVICES\* (TOTAL VALUE MANAGED)**

SACM Tactical Management	Tax Management	Value - Based Screening
0.25%	0.35%	0.30%

\* SummitAlliance Capital Management, LLC reserves the right to negotiate fees on an individual account basis.

The actual blended fee is a weighted average of the individual category fees, as detailed in the above table. Although the fee rate is contractually fixed, the fee paid will change over time due to changes in the relative allocation of assets between the categories. The total fee paid by the Client will change over time due to changes in selected mutual funds, the relative allocation of assets to each category and the amount of assets in the Client's Program Account(s), which may change due to additions, withdrawals and investment performance.

The above SummitAlliance Program Fee does not include mutual fund internal expenses (including ETFs) and some externally managed accounts or private placement offerings. Please refer to mutual fund prospectuses or fund disclosure documents for more details.

SummitAlliance Capital Management, LLC fee includes the payment of Custodian fees (execution and clearing costs). Fees such as wire transfers and check printing will be charged to the client account if and when incurred.

The Program Fee may be higher for certain Advisors affiliated with NASD member firms based on any amounts payable to broker-dealers with supervisory responsibility over the Advisor. In such cases, a portion of the Program Fee is paid to such broker-dealers as compensation for compliance and administrative services provided in connection with the Program.

The Program Fee may be lower for certain Advisors based on total aggregate assets in the Program or based on other factors deemed important by SummitAlliance in SummitAlliance's sole judgment.

A portion of the Program Fee charged by SummitAlliance is paid as compensation to Sub-advisors based on the assets invested in their respective Models, as well as to the Custodian of Client assets for trade execution and custody services.

**Custodian Firms**

In addition to amounts paid directly by the Sponsor for execution and clearing services, Custodians may also receive Shareholder Servicing Fees or other forms of compensation from individual mutual funds and/or other investment products. This fee generally ranges from .25% - .35% per annum of the amount invested through the Program in the mutual funds of each fund family. This is not an additional amount paid by Client, but rather is a part of the funds internal operating expenses.

**Other Compensation Issues**

Each of the mutual funds, ETFs and variable annuity sub-accounts included in the Program bears its own operating expenses. Such internal expenses are in addition to the fees paid to SummitAlliance and the Client's individual Advisor. The ratios of fund expenses to assets vary from fund to fund according to the actual amounts of expenses incurred and fluctuations in the fund's daily net assets. Information on the specific expenses for each of the mutual funds is set forth in the fund's prospectus and periodic reports provided by the fund to the Client. Information concerning the specific expenses of each variable annuity sub-account and any other expenses assessed by each variable annuity issuer are contained in the Prospectus delivered to the Client by the variable annuity issuer.

The cost of advisory and investment management services provided through the Program may be more or less than the cost of purchasing similar services separately. For example, unmanaged direct investment in a mutual fund, ETF or variable annuity sub-account would be less expensive than participation in the Program, because the Client would not bear the SummitAlliance Program Fee. All mutual funds included in the Program will be funds available for purchase at each fund's net asset value and with no sales charge, so that no sales commissions are incurred in connection with investment in the initial portfolio and portfolio rebalancing. Variable annuity accounts may be subject to transaction costs in connection with portfolio rebalancing as provided in the Prospectus delivered to the Client by the variable annuity issuer. Such costs, if incurred, would be in addition to the SummitAlliance Program Fee.

The Program Fee for related accounts of any Client in the Program aggregating in excess of \$5,000,000 are negotiable between SummitAlliance and the Client.

SummitAlliance sponsors annual conferences for its participating financial professionals designed to facilitate and promote the success of the Program and its participating financial professionals. SummitAlliance also bears the cost of airfare for certain financial professional clients to attend SummitAlliance's annual conference or to conduct due diligence visits to SummitAlliance offices. In addition, SummitAlliance may, from time to time, support Advisors by sponsoring conferences or other client events conducted by investment advisers.

**VI. POTENTIAL CONFLICTS OF INTEREST**

Due to the fact that SummitAlliance pays Sub-advisors and Custodians from the total Program Fee charged to each Client, there is a financial incentive for SummitAlliance to keep such expenses as low as possible. Like any business,

when expenses are reduced, profitability is increased. Since fees paid to Sub-advisors and Custodians differ from firm to firm, SummitAlliance would benefit financially to a greater extent from the recommendation of certain Sub-advisors and Custodians from among all available in the Program. Mitigating this potential conflict, however, is the fact that all Sub-advisors must pass a standardized, rigorous due diligence process to be admitted to the Program before management fees are negotiated, and all Custodian firms deliver substantially equivalent services.

**FORM ADV**  
**Part II - Page 1** Uniform Application for Investment Adviser Registration

OMB APPROVAL  
 OMB Number: 3235-0049  
 Expires: February 28, 2001  
 Estimated average burden  
 hours per response: .901

Name of Investment Adviser:  
**SummitAlliance Capital Management, LLC**  
 Address: (Number and Street) (City) (State) (Zip Code) Area Code: Telephone Number:  
 14785 Preston Road, Ste. 1000 Dallas TX 75254 (972) 663-4300

This part of Form ADV gives information about the investment adviser and its business for the use of clients. The information has not been approved or verified by any government authority.

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(Schedules A, B, C, D, and E are included with Part I of this Form, for the use of regulatory bodies, and are not distributed to clients.)

SEC 1701 (1/99)

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**FORM ADV**  
**Part II - Page 2** Applicant: **SummitAlliance Capital Management, LLC** SEC File Number: **801-60900** Date: **September 1, 2009**

Definitions for Part II

Related person - Any officer, director or partner of applicant or any person directly or indirectly controlling, controlled by, or under common control with the applicant, including any non-clerical, non-ministerial employee.

Investment Supervisory Services - Giving continuous investment advice to a client (or making investments for the client) based on the individual needs of the client. Individual needs include, for example, the nature of other client assets and the client's personal and family obligations.

**1. A. Advisory Services and Fees.** (check the applicable boxes) For each type of service provided, state the approximate % of total advisory billings from that service. Estimates (See instruction below.)

Applicant:	Estimates
<input checked="" type="checkbox"/> (1) Provides investment supervisory services	100%
<input type="checkbox"/> (2) Manages investment advisory accounts not involving investment supervisory services	0%
<input type="checkbox"/> (3) Furnishes investment advice through consultations not included in either service described above	0%
<input type="checkbox"/> (4) Issues periodicals about securities by subscription	0%
<input type="checkbox"/> (5) Issues special reports about securities not included in any service described above	0%
<input type="checkbox"/> (6) Issues, not as part of any service described above, any charts, graphs, formulas, or other devices which clients may use to evaluate securities	0%
<input type="checkbox"/> (7) On more than an occasional basis, furnishes advice to clients on matters not involving securities	0%
<input type="checkbox"/> (8) Provides a timing service	0%
<input type="checkbox"/> (9) Furnishes advice about securities in any manner not described above	0%

(Percentages should be based on applicant's last fiscal year. If applicant has not completed its first fiscal year, provide estimates of advisory billings for that year and state that the percentages are estimates.)

**B.** Does the applicant call any of the services it checked above financial planning or some similar term?  Yes  No

**C.** Applicant offers investment advisory services for: (check all that apply):

<input checked="" type="checkbox"/> (1) A percentage of assets under management	<input checked="" type="checkbox"/> (4) Subscription fees
<input type="checkbox"/> (2) Hourly charges	<input type="checkbox"/> (5) Commissions
<input type="checkbox"/> (3) Fixed fees (not including subscription fees)	<input type="checkbox"/> (6) Other

**D.** For each checked box in A above, describe on Schedule F:

- the services provided, including the name of any publication or report issued by the adviser on a subscription basis or for a fee
- applicant's basic fee schedule, how fees are charged and whether its fees are negotiable
- when compensation is payable, and if compensation is payable before service is provided, how a client may get a refund or may terminate an investment advisory contract before its expiration date

**2. Types of Clients - Applicant generally provides investment advice to:** (check those that apply)

<input checked="" type="checkbox"/> A. Individuals	<input checked="" type="checkbox"/> E. Trusts, estates, or charitable organizations
<input checked="" type="checkbox"/> B. Banks or thrift institutions	<input checked="" type="checkbox"/> F. Corporations or business entities other than those listed above
<input type="checkbox"/> C. Investment companies	<input type="checkbox"/> G. Other (describe on Schedule F)
<input checked="" type="checkbox"/> D. Pension and profit-sharing plans	

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

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**FORM ADV**  
**Part II - Page 3** Applicant: **SummitAlliance Capital Management, LLC** SEC File Number: **801-60900** Date: **September 1, 2009**

**3. Types of Investments.** Applicant offers advice on the following: (check those that apply)

<input checked="" type="checkbox"/> A. Equity Securities (1) exchange-listed securities <input checked="" type="checkbox"/> (2) securities traded over-the-counter <input checked="" type="checkbox"/> (3) foreign issues	<input checked="" type="checkbox"/> H. United States government securities
<input checked="" type="checkbox"/> B. Warrants	<input checked="" type="checkbox"/> I. Options contracts on: (1) securities (2) commodities
<input checked="" type="checkbox"/> C. Corporate debt securities (other than commercial paper)	<input type="checkbox"/> J. Futures contracts on: (1) tangibles (2) intangibles
<input checked="" type="checkbox"/> D. Commercial paper	<input checked="" type="checkbox"/> K. Interests in partnerships investing in: (1) real estate (2) oil and gas interests (3) other (explain on Schedule F)
<input checked="" type="checkbox"/> E. Certificates of deposit	<input checked="" type="checkbox"/> L. Other (explain on Schedule F)
<input checked="" type="checkbox"/> F. Municipal securities	
<input checked="" type="checkbox"/> G. Investment company securities (1) variable life insurance <input checked="" type="checkbox"/> (2) variable annuities <input checked="" type="checkbox"/> (3) mutual fund shares	

**4. Methods of Analysis, Sources of Information, and Investment Strategies.**

**A.** Applicant's security analysis methods include: (check those that apply)

(1) <input checked="" type="checkbox"/> Charting	(4) <input checked="" type="checkbox"/> Cyclical
(2) <input checked="" type="checkbox"/> Fundamental	(5) <input type="checkbox"/> Other (explain on Schedule F)
(3) <input checked="" type="checkbox"/> Technical	

**B.** The main sources of information applicant uses include: (check those that apply)

(1) <input checked="" type="checkbox"/> Financial newspapers and magazines	(5) <input type="checkbox"/> Timing services
(2) <input checked="" type="checkbox"/> Inspections of corporate activities	(6) <input checked="" type="checkbox"/> Annual reports, prospectuses, filings with the Securities and Exchange Commission
(3) <input checked="" type="checkbox"/> Research materials prepared by others	(7) <input checked="" type="checkbox"/> Company press releases
(4) <input checked="" type="checkbox"/> Corporate rating services	(8) <input type="checkbox"/> Other (explain on Schedule F)

**C.** The investment strategies used to implement any investment advice given to clients include: (check those that apply)

(1) <input checked="" type="checkbox"/> Long term purchases (securities held at least a year)	(5) <input checked="" type="checkbox"/> Margin transactions
(2) <input checked="" type="checkbox"/> Short term purchases (securities sold within a year)	(6) <input checked="" type="checkbox"/> Option writing, including covered options, uncovered options or spreading strategies
(3) <input checked="" type="checkbox"/> Trading (securities sold within 30 days)	(7) <input type="checkbox"/> Other (explain on Schedule F)
(4) <input checked="" type="checkbox"/> Short sales	

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

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**FORM ADV**  
**Part II - Page 4** Applicant: **SummitAlliance Capital Management, LLC** SEC File Number: **801-60900** Date: **September 1, 2009**

**5. Education and Business Standards.** Are there any general standards of education or business experience that applicant requires of those involved in determining or giving investment advice to clients?  Yes  No  
 (If yes, describe these standards on Schedule F.)

**6. Education and Business Background.**

For:

- each member of the investment committee or group that determines general investment advice to be given to clients, or
- if the applicant has no investment committee or group, each individual who determines general investment advice given to clients (if more than five, respond only for their supervisors)
- each principal executive officer of applicant or each person with similar status or performing similar functions.

On Schedule F, give the:

- name
- year of birth
- formal education after high school
- business background for the preceding five years

**7. Other Business Activities.** (check those that apply)

A. Applicant is actively engaged in a business other than giving investment advice.

B. Applicant sells products or services other than investment advice to clients.

C. The principal business of applicant or its principal executive officers involves something other than providing investment advice.

(For each checked box describe the other activities, including the time spent on them, on Schedule F.)

**8. Other Financial Industry Activities or Affiliations.** (check those that apply)

A. Applicant is registered (or has an application pending) as a securities broker-dealer.

B. Applicant is registered (or has an application pending) as a futures commission merchant, commodity pool operator or commodity trading adviser.

C. Applicant has arrangements that are material to its advisory business or its clients with a related person who is a:

<input checked="" type="checkbox"/> (1) broker-dealer	<input type="checkbox"/> (7) accounting firm
<input type="checkbox"/> (2) investment company	<input type="checkbox"/> (8) law firm
<input type="checkbox"/> (3) other investment adviser	<input type="checkbox"/> (9) insurance company or agency
<input checked="" type="checkbox"/> (4) financial planning firm	<input type="checkbox"/> (10) pension consultant
<input type="checkbox"/> (5) commodity pool operator, commodity trading adviser or futures commission merchant	<input type="checkbox"/> (11) real estate broker or dealer
<input checked="" type="checkbox"/> (6) banking or thrift institution	<input type="checkbox"/> (12) entity that creates or packages limited partnerships

(For each checked box in C, on Schedule F identify the related person and describe the relationship and the arrangements.)

**D.** Is applicant or a related person a general partner in any partnership in which clients are solicited to invest?  Yes  No  
 (If yes, describe on Schedule F the partnerships and what they invest in.)

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

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**9. Participation or Interest in Client Transactions.**  
 Applicant or a related person: (check those that apply)  
 A. As principal, buys securities for itself from or sells securities it owns to any client.  
 B. As broker or agent effects securities transactions for compensation for any client.  
 C. As broker or agent for any person other than a client effects transactions in which client securities are sold to or bought from a brokerage customer.  
 D. Recommends to clients that they buy or sell securities or investment products in which the applicant or a related person has some financial interest.  
 E. Buys or sells for itself securities that it also recommends to clients.  
 (For each box checked, describe on Schedule F when the applicant or a related person engages in these transactions and what restrictions, internal procedures, or disclosures are used for conflicts of interest in those transactions.)

**10. Conditions for Managing Accounts.** Does the applicant provide investment supervisory services, manage investment advisory accounts or hold itself out as providing financial planning or some similarly termed services and impose a minimum dollar value of assets or other conditions for starting or maintaining an account? Yes  No   
 (If yes, describe on Schedule F.)

**11. Review of Accounts.** If applicant provides investment supervisory services, manages investment advisory accounts, or holds itself out as providing financial planning or some similarly termed services:  
 A. Describe below the reviews and reviewers of the accounts. For reviews, include their frequency, different levels, and triggering factors. For reviewers, include the number of reviewers, their titles and functions, instructions they receive from applicant on performing reviews, and number of accounts assigned each.  
**Portfolio account data is maintained on Advisor's computerized database system which tracks all values and transactions on a daily basis. Portfolios are reviewed by the Investment Management Department no less than once per month. These reviews are intended to monitor asset allocation, volatility, cash levels, and performance of holdings.**  
**In general, Advisor outsources day-to-day Investment Management to third-party managers. Advisor supervises the investment of client funds in no-load mutual funds, in portfolios directly managed by one of SummitAlliance Capital Management, LLC's subsidiary management firms, or in independent third-party managers. Advisor coordinates the trading activity of the managers.**  
**Advisor's Investment Committee is comprised of Douglas Gill, Co-Chief Investment Officer; Christopher K. High, Co-Chief Investment Officer; Scott Zachary; W. Michael Cox, PhD; Judson Bailey, CFA; Will Rodgers; and other financial professionals as may serve from time-to-time. These other professionals will come from both inside and outside SummitAlliance Investment Group, LLC.**  
 B. Describe below the nature and frequency of regular reports to clients on their accounts.  
**Consolidated portfolio statements which detail the current value of holdings, asset allocation, aggregate account value and other information pertinent to the investment decision-making process are provided not less frequently than once per quarter.**  
**Special communications are directed to clients from time-to-time. Such reporting will be made available to clients via the World Wide Web. (consolidated tax statements for the tax year in question will be provided to clients)**

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

**Part II - Page 6**

**12. Investment or Brokerage Discretion.**  
 A. Does applicant or any related person have authority to determine, without obtaining specific client consent, the:  
 (1) securities to be bought or sold? Yes  No   
 (2) amount of the securities to be bought or sold? Yes  No   
 (3) broker or dealer to be used? Yes  No   
 (4) commission rates paid? Yes  No   
 B. Does applicant or a related person suggest brokers to clients? Yes  No   
 For each yes answer to A describe on Schedule F any limitations on the authority. For each yes to A(3), A(4) or B, describe on Schedule F the factors considered in selecting brokers and determining the reasonableness of their commissions. If the value of products, research and services given to the applicant or a related person is a factor, describe:  
 • the products, research and services  
 • whether clients may pay commissions higher than those obtainable from other brokers in return for those products and services  
 • whether research is used to service all of applicant's accounts or just those accounts paying for it; and  
 • any procedures the applicant used during the last fiscal year to direct client transactions to a particular broker in return for products and research services received.

**13. Additional Compensation.**  
 Does the applicant or a related person have any arrangements, oral or in writing, where it:  
 A. is paid cash by or receives some economic benefit (including commissions, equipment or non-research services) from a non-client in connection with giving advice to clients? Yes  No   
 B. directly or indirectly compensates any person for client referrals? Yes  No   
 (For each yes, describe the arrangements on Schedule F.)

**14. Balance Sheet.** Applicant must provide a balance sheet for the most recent fiscal year on Schedule G if applicant:  
 • has custody of client funds or securities; or  
 • requires prepayment of more than \$500 in fees per client and 6 or more months in advance  
 Has applicant provided a Schedule G balance sheet? Yes  No

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

<b>Schedule F of Form ADV Continuation Sheet for Form ADV Part II</b>		Applicant: SummitAlliance Capital Management, LLC	SEC File Number: 801-69090	Date: September 1, 2009
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1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: SummitAlliance Capital Management, LLC		IRS Empl. Ident. No.:
Item of Form (Identify)	Answer	
Part II – Page 2 #1.D.	<p><b>INTRODUCTION</b></p> <p>SummitAlliance Capital Management, LLC offers an array of investment services designed to address the major areas of personal wealth management including, but not limited to, investment portfolio management and investment management evaluation. SummitAlliance Capital Management, LLC provides advice, services, and recommendations only after conferring with Client and Client's financial planner. Client is always free to accept or reject any advice or recommendations, in whole or in part.</p> <p><b>A copy of SummitAlliance Capital Managements, LLC's "Code of Ethics" will be made available upon request.</b></p> <p><b>PORTFOLIO MANAGEMENT SERVICES</b></p> <p>Clients choosing to engage SummitAlliance Capital Management, LLC for on-going investment supervisory services will pay a fee for the services SummitAlliance Capital Management, LLC provides. The fee will be debited from the Client's investment account either as a single consolidated fee or multi-component fee depending on the arrangement with outside managers. A fee is assessed for the continual supervision/management of the portfolio investments.</p> <p>SummitAlliance Capital Management, LLC reserves the right to negotiate fees, <i>higher or lower</i>, depending on unique circumstances. Clients' personal financial planner will impose a separate fee. Any outside money managers that sub-advise an asset class strategy will be paid by SummitAlliance Capital Management from the total fee above unless an unbundled fee arrangement is made with the Client. The above fees apply to most investment assets, but there are exceptions. Exceptions would include certain alternative investment classes that require special management, such as distressed securities, real estate or hedge funds.</p> <p>Fees are billed quarterly. The financial advisor has the option to select billing in advance or in arrears. The Client should refer to the fee section of the Client Management Agreement to determine the selection of the financial advisor. Fees are debited directly from Client's investment account for the agreed upon period's management services unless other arrangements are made prior to the engagement.</p> <p>Certain investments recommended for ownership in Client portfolios will have their own internal operating expenses that are a cost to the Client that comes out of the investment's total return. Such an example would be the annual expense ratio of a mutual fund product. SummitAlliance Capital Management, LLC receives no economic benefit from such expenses and seeks investment products which strive to keep such expenses low relative to other similar investments.</p> <p>As part of SummitAlliance Capital Management, LLC's portfolio supervisory services, Clients receive portfolio reports detailing account values, deposit and withdrawal activity, performance, and the amount of management fee assessed. Each quarter, reports are produced which provide data about asset allocation and portfolio performance relative to benchmarks. During the first quarter of each year, SummitAlliance Capital Management, LLC provides assistance with tax reporting by generating Schedule D and Schedule B information as needed.</p>	

(Schedules A, B, C, D, and E are included with Part I of this Form, for the use of regulatory bodies, and are not distributed to clients.)

SEC 1701 (1/99)

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<b>Schedule F of Form ADV Continuation Sheet for Form ADV Part II</b>		Applicant: SummitAlliance Capital Management, LLC	SEC File Number: 801-69090	Date: September 1, 2009
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1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: SummitAlliance Capital Management, LLC		IRS Empl. Ident. No.:
Item of Form (Identify)	Answer	
Part II, Page 2 #1.D. (Cont.)	<p><b>CUSTODY OF FUNDS</b></p> <p>SummitAlliance Capital Management, LLC does not take custody of Client assets, but will recommend a suitable custodian to Client. For the service provided in opening accounts, transacting trades, wiring funds and/or other administrative functions, the custodian may charge certain fees. The custodian of Client assets will, in most cases, charge fees and/or commissions for their services. SummitAlliance Capital Management, LLC negotiates with custodians to keep custodian and trading costs at a reasonable level. SummitAlliance Capital Management, LLC pays the transaction charges of the custodian as part of the SummitAlliance Capital Management, LLC fee, unless an unbundled method is selected by a participating broker/dealer firm. In this case, SummitAlliance debits only its fee and the broker/dealer collects its fee or transaction charges.</p> <p><b>RETIREMENT PLAN SERVICES</b></p> <p>In situations where SummitAlliance Capital Management, LLC recommends the establishment of company-sponsored retirement plans, SummitAlliance Capital Management, LLC will evaluate both short-term and long-term needs. After such assessment, SummitAlliance Capital Management, LLC will propose the use of a plan administration firm and recommend one or more investment managers for plan assets. SummitAlliance Capital Management, LLC may recommend the use of its own proprietary supervisory services.</p> <p>All investment management services and administration services will be provided on a fully-disclosed basis. Prior to any engagement, Client will receive, in writing, a schedule of all charges to be assessed to the company sponsoring the plan and/or plan assets. Since the number of possible administration firms and investment managers is numerous, any specific reference to their charges has been omitted.</p> <p>Generally, administration firms provide the record-keeping and IRS conformity testing for the plan and charge a flat annual fee plus a per-participant charge. Investment managers will typically charge an annual fee for assets-under-management depending on the size of the plan and the number of investment options used.</p>	
Part II, Page 3 #3.K.	SummitAlliance Capital Management, LLC has material relationships with affiliated investment management vendors and with SummitAlliance Advisors, LLC, a subsidiary company of SummitAlliance Investment Group, L.L.C.	
Part II, Page 3 #3.L.	Direct Participation investments such as partnerships owning real estate, oil and gas properties, operating companies, or other similar investments will be assessed fees based on complexity and time required for proper supervision and set out in writing prior to any such investment by Client. Direct Participation investments will be assessed a management fee no less than two percent (2.00%) per annum. These types of investment involve a high degree of risk including lack of marketability and above-average potential for loss of entire investment.	
Part II, Page 4 #5.	SummitAlliance Capital Management, LLC has relationships with third-party money managers who charge a management fee for asset management services. Detailed information on these separate account managers along with separate disclosure documents is furnished when SummitAlliance Capital Management, LLC recommends a separate asset manager. In some cases, these fees will be paid by SummitAlliance Capital Management, LLC and in other cases, clients will pay such other money managers by separate fee.	

<b>Schedule F of Form ADV Continuation Sheet for Form ADV Part II</b>		Applicant: SummitAlliance Capital Management, LLC	SEC File Number: 801-69090	Date: September 1, 2009
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1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: SummitAlliance Capital Management, LLC		IRS Empl. Ident. No.:
Item of Form (Identify)	Answer	
Part II, Page 4 #6.	SummitAlliance Capital Management, LLC requires a bachelors degree for employees engaged in offering investment and/or financial advice to Clients. SummitAlliance Capital Management, LLC expects each member of the Investment Committee to possess professional designations such as Certified Financial Planner, Chartered Financial Analyst, Certified Public Accountant and/or advanced degree or similar licenses or equivalent industry experience.	
Part II, Page 4 #8.C.	<p>Please refer to Page 5 of this Schedule F for Education and Business Background.</p> <p>Item 8.C. (1) SummitAlliance Securities, LLC is a wholly-owned subsidiary of SummitAlliance Investment Group, L.L.C. and is a registered broker-dealer firm. Through SummitAlliance Capital Management, LLC's parent company, SummitAlliance Investment Group, L.L.C., SummitAlliance Capital Management, LLC benefits indirectly from the relationship with SummitAlliance Securities, LLC for the sale of investment products.</p> <p>Item 8.C. (3) SummitAlliance Capital Management, LLC is related to SummitAlliance Advisors, LLC through a common parent company, SummitAlliance Investment Group, L.L.C.</p> <p>Item 8.C. (4) SummitAlliance Capital Management, LLC will, from time-to-time, sub-contract with other financial planning firms for services offered to SummitAlliance Capital Management, LLC Clients. This may include using other planners to prepare reports and analysis for Clients. In these cases, confidential Client information would be shared with such planners for the sole purpose of preparing reports and analysis.</p>	
Part II, Page 5 #9.	<p>Item 9.B SummitAlliance Capital Management, LLC is related to SummitAlliance Securities, LLC which is a registered broker-dealer firm.</p> <p>Item 9.D. and 9.E. SummitAlliance Capital Management, LLC and/or its employees will buy and sell investments from time-to-time. The investments may or may not be the same securities that clients own or that SummitAlliance Capital Management, LLC recommends to clients. In some cases, investment objectives may mean SummitAlliance Capital Management, LLC or its employees make trades identical to or contrary to those recommended or made for clients. In no case will SummitAlliance Capital Management, LLC or its employees put its orders or interests ahead of clients or make any trading decision which could disadvantage a client.</p>	
Part II, Page 5 #10.	Our money management services are generally limited to accounts of \$250,000 or larger. Smaller amounts may be accepted on a case-by-case basis. Portfolios of less than \$100,000 are managed primarily through the use of mutual funds and ETFs.	
Part II, Page 6 #12.	<p>Item 12.A. (3) SummitAlliance Investment Group, L.L.C. provides for the sale of investment products through its own registered broker-dealer, SummitAlliance Securities, LLC, a wholly-owned subsidiary of SummitAlliance Investment Group, L.L.C.</p> <p>Item 12.A. (4) SummitAlliance Capital Management, LLC negotiates with custodian firms to set commission rates below its published retail rates.</p> <p>Item 12.B. SummitAlliance Capital Management, LLC and SummitAlliance Securities, LLC considers factors such as quality of trade execution, quality of research and information, and availability of services and products when selecting custodians. The rate that Client pays custodian for trade execution and services may be higher than the rate available at some deep discount or on-line brokerage firms. SummitAlliance Capital Management, LLC and SummitAlliance Securities, LLC believe that the benefits and features of recommended custodians is of sufficient value to</p>	

<b>Schedule F of Form ADV Continuation Sheet for Form ADV Part II</b>		Applicant: SummitAlliance Capital Management, LLC	SEC File Number: 801-69090	Date: September 1, 2009
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1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: SummitAlliance Capital Management, LLC		IRS Empl. Ident. No.:																								
Item of Form (Identify)	Answer																									
Part II, Page 6 #13.	<p>warrant Client paying a higher transaction cost than could be achieved at other firms. Any research or software that becomes available through the custodian will be used for the benefit of all Clients equally, even though some clients may pay a higher proportional total share of all commissions generated by Advisor's client base.</p> <p>Item 13.A. While SummitAlliance Capital Management, LLC receives no compensation directly from custodian firms, it may have "soft-dollar" arrangements whereby custodian firms will credit an account based on trading revenues. This account is then used to purchase research and computer software used in providing investment advisory services to Clients.</p> <p>Item 13.B. SummitAlliance Capital Management, LLC compensates other professionals for the referral of clients. Some advisors referring accounts to SummitAlliance Capital Management, LLC may participate in the Quick Start program whereby SummitAlliance Capital Management, LLC pays advisors a marketing fee, generally in the form of an advance, in exchange for the advisor introducing accounts to SummitAlliance. Not all advisors participate in the Quick Start program. All such participation must be disclosed by special disclosure document attached to the management agreement.</p>																									
Part II, Page 4 #6.	<p><b>DOUGLAS W. GILL</b></p> <p>Born: 1968 Education: B.S. Economics B.A. Philosophy Southern Methodist University</p> <p>Professional Designations: Certified Financial Planner</p> <p>Business Background:</p> <table border="1"> <tr> <td>SummitAlliance Investment Group, L.L.C.</td> <td>Chief Executive Officer</td> <td>8/01-Present</td> </tr> <tr> <td>SummitAlliance Securities, LLC</td> <td>President</td> <td>9/01-Present</td> </tr> <tr> <td>Gill Capital Management, Inc.</td> <td>President</td> <td>6/99-Present</td> </tr> <tr> <td>Advisors Capital Management, Inc.</td> <td>President</td> <td>3/00-12/00</td> </tr> <tr> <td>Perryman &amp; Gill Financial Advisory, Inc.</td> <td>Shareholder, Director</td> <td>3/91-7/99</td> </tr> <tr> <td>Williams Financial Group, Inc.</td> <td>Registered Principal</td> <td>4/00-2/01</td> </tr> <tr> <td>SWS Financial Services, Inc.</td> <td>Registered Rep.</td> <td>11/91-5/00</td> </tr> <tr> <td>Capital Advisory Group, Inc.</td> <td>Advisory Associate</td> <td>3/91-10/94</td> </tr> </table>	SummitAlliance Investment Group, L.L.C.	Chief Executive Officer	8/01-Present	SummitAlliance Securities, LLC	President	9/01-Present	Gill Capital Management, Inc.	President	6/99-Present	Advisors Capital Management, Inc.	President	3/00-12/00	Perryman & Gill Financial Advisory, Inc.	Shareholder, Director	3/91-7/99	Williams Financial Group, Inc.	Registered Principal	4/00-2/01	SWS Financial Services, Inc.	Registered Rep.	11/91-5/00	Capital Advisory Group, Inc.	Advisory Associate	3/91-10/94	
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**Schedule F of Form ADV Continuation Sheet for Form ADV Part II**

Applicant:	SEC File Number:	Date:
SummitAlliance Capital Management, LLC	801-60900	September 1, 2009

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

Item of Form (Identify)	Answer	BS Empl. Ident. No.
1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>SummitAlliance Capital Management, LLC</b>		
	Mabon, Nugent New York, New York	Trading/Research 8/90-12/90
	Regal Asset Management Dallas, Texas	Trading/Research 5/87-7/90
<b>CHRISTOPHER K. HIGH</b>		
Born: 1970		
Education: A.B. Political Economics Princeton University		
Professional Designations: FINRA Series 7, 63, 65		
Business Background:		
	SummitAlliance Investment Group, L.L.C. Dallas, Texas	Executive Vice President 1/04-Present
	SummitAlliance Securities, LLC Dallas, Texas	Registered Rep. 1/04-Present
	Citigroup Global Markets Plano, Texas	Registered Rep. 7/02-1/04
	Deutsche Bank Alex. Brown Dallas, Texas	Registered Rep. 6/00-7/02
	Crown Management Services Presto, Pennsylvania	Chief Investment Officer 1/00-5/00
	Deutsche Bank Alex. Brown Dallas, Texas	Registered Rep. 7/96-1/00
	H&R Block Financial Advisors, Inc Dallas, Texas	Registered Rep. 6/94-7/96
<b>SCOTT M. ZACHARY</b>		
Born: 1971		
Education: B.B.A. Accounting/Finance Texas A&M University		
Professional Designations: FINRA Series 7, 63		
Business Background:		
	SummitAlliance Investment Group, L.L.C. Dallas, Texas	V.P. Director of Investment Management 12/07 - Present

**Schedule F of Form ADV Continuation Sheet for Form ADV Part II**

Applicant:	SEC File Number:	Date:
SummitAlliance Capital Management, LLC	801-60900	September 1, 2009

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

Item of Form (Identify)	Answer	BS Empl. Ident. No.
1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>SummitAlliance Capital Management, LLC</b>		
	SummitAlliance Securities, LLC Dallas, Texas	Registered Rep. 12/07-Present
	Smith Barney Plano, Texas	FA/Portfolio Manager 05/99-10/07
	Olde Discount Stockbrokers, Inc. Dallas, Texas	Registered Representative 08/94-05/99