

Part 2A of Form ADV: Summit Capital, Inc.

**Summit Capital, Inc.
Investment Management**

Form ADV Part 2A- Disclosure Brochure

March 1, 2024

This Brochure provides information about the qualifications and business practices of Summit Capital, Inc. If you have any questions about the contents of this brochure, please contact us at (216) 839-8444.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Additional information about Summit Capital Inc. is also available at the SEC's website at www.advisorsinfo.sec.gov.

Summit Capital Inc. is a registered investment advisor. The term "registered investment advisor" does not imply a certain level of skill or training.

Summit Capital Inc.
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Phone (216) 839-8444

www.summit-capital.com

Item 2: Material Changes

In the future, Item 2 will be used to provide clients with a summary of material changes that are made to this brochure since the last annual update.

Listed below are the material changes since the last annual Form ADV Part 2A dated March 1, 2023.

- During 2023 the acquisition of TD Ameritrade by Charles Schwab was completed. Due to this acquisition, the custodian where client accounts are held and transactions conducted changed from TD Ameritrade, Inc. to Charles Schwab & Co., Inc. for those clients that had accounts with TD Ameritrade.
- There were no other Material Changes.

This brochure dated March 1, 2024 replaces the last brochure dated March 1, 2023.

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Item 4: Advisory Business

The Company

Summit Capital, Inc. (Summit) was founded in January, 1998 and is an Ohio based investment advisor registered with the State of Ohio that is 100% owned by James Onorato.

Investment Services

Summit Capital provides investment management services to individuals, Trusts, and retirement plans. Our strategy predominately uses individual equities, no-load mutual funds, exchange traded funds (ETF's) and closed end mutual funds but may include investments in corporate debt, municipal securities, United States government obligations and option contracts on securities. Summit will act as an investment advisor and will supervise and direct the investments and make all investment decisions for the client based on the client's risk aversion. Summit Capital does not provide any financial planning services.

Assets Under Management

As of December 31, 2023, Summit Capital had approximately \$222,381,272 in assets managed on a discretionary basis.

Item 5: Fees and Compensation

Investment management services are provided based on written agreement. The agreement includes fee schedules, and advisory fees are generally payable quarterly in advance based upon the net value of the account on the last business day of the previous quarter. For accounts opened during the quarter, the net value of assets contributed to the account serves as the basis for the fees for that quarter which is calculated on a prorated basis. As part of the written agreement, Client authorizes the custodian to deduct Summit's fee directly from the account upon presentation of an appropriate invoice showing the calculation of the fee. Fees are based solely upon a percentage of assets under management.

Our Standard Fee Schedule is:

- 1.5% of the first \$500,000
- 1.0% of the next \$1.5 million
- .75% of the next \$1 million
- .50% of the amount above \$3 million

For example, if your account is \$2.5 million in value, the quarterly fee is calculated by multiplying \$500,000 by .015 plus multiplying \$1.5 million by .010 plus multiplying \$500,000 by .0075, then take the total sum and divide by 4 to arrive at the total due. All of your accounts are grouped when determining fee.

The Agreement may be cancelled by either party in accordance with the provisions of the Agreement. If the Agreement is canceled prior to the end of the calendar quarter, the unearned portion of the fee will be returned to the Client. Clients may also terminate the Agreement

without incurring any fees within five days of signing. The foregoing describes Summit's basic fee schedule, however, fees may be negotiable based on the specific nature and scope of the engagement.

Your death will not terminate the Investment Management Agreement or authority granted to Summit Capital until we have received actual written notification of your death.

Other Fees and Expenses

In addition to the fees paid to Summit, Clients may pay other expenses. For example, mutual fund companies and exchange traded funds impose internal fees and expenses on their clients that are separate from the fees paid to Summit. Other expenses such as commissions, transaction fees and custodial fees may also be incurred which are unrelated to the fees collected from Summit. Refer to Item 12: Brokerage Practices.

Item 6: Performance – Based Fees and Side-By-Side Management

Summit does not receive any performance based fees and does not participate in a share of the capital gains or appreciation of the assets of the client.

Item 7: Types of Clients

Summit Capital provides investment management services to individuals and institutional investors including trusts, estates, charitable organizations, corporations or other business entities.

Summit's minimum opening balance for new individually managed accounts is \$100,000. An individual's personal account, joint account with spouse, spouse's account, retirement account and spouse's retirement account can be aggregated for purposes of meeting the minimum opening balance requirement. Smaller accounts may be accepted by Summit, at its discretion, if related to other accounts under management by Summit, or in other unusual circumstances. Summit reserves the right to accept or reject accounts at its sole discretion.

Item 8: Methods of Analysis, Investment Strategies and Risk of Loss

Summit Capital will explore and consider investments in various securities such as mutual funds, exchange traded funds, closed end funds, common stocks, preferred stocks, and corporate, municipal and government issued fixed income securities. Exposure to foreign companies and economies may be employed to take advantage of growth opportunities in other regions of the world.

Equity Investments

When equities are a prudent choice, we attempt to identify the best funds or companies that can be acquired at reasonable prices. When evaluating mutual funds and exchange traded funds a variety of factors will be considered including the underlying portfolio holdings of the fund, the track record and history of the fund manager, and fund expenses. Once a client's risk profile has been determined and an allocation to equity investments has been decided, Summit will construct a portfolio using a variety equity securities to adequately diversify the equity portion of the client's portfolio.

Fixed Income Investments

Summit generally uses mutual funds, exchange traded funds and closed end funds to invest in the fixed income markets. In certain cases Summit will consider individual issues of corporate, municipal and government issued debt for client portfolios.

Risks

Summit's investment activities may involve a significant degree of risk. The performance of any investment is subject to numerous factors which are neither within the control of nor predictable by Summit. Such factors include a wide range of economic, political, competitive, technological and other conditions (including acts of terrorism and war) that may affect investments in general or specific industries or companies. The securities markets may be volatile, which may adversely affect the ability of Summit to realize profits. As a result of the nature of Summit's investing activities, it is possible that the financial performance may fluctuate over time and from period to period.

Market or Interest Rate Risk

The price of most fixed income securities move in the opposite direction of interest rates. For example, as interest rates rise, the prices of fixed income securities fall. Changes in interest rates will affect the values of fixed income securities.

Item 9: Disciplinary Information

Legal and Disciplinary

Registered Investment Advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Summit Capital and the integrity of our management of your assets. We have no information that applies to this item.

Criminal or Civil Action

Registered Investment Advisors are required to disclose all material facts regarding any criminal or civil action events that would be material to your evaluation of Summit Capital and the integrity of our management of your assets. Summit Capital is subject to 3 State of Ohio Tax liens filed with the Cuyahoga County Court of Common Pleas that total \$3,214. We have no other information that applies to this item.

Administrative Proceeding

Registered Investment Advisors are required to disclose all material facts regarding any administrative proceeding that would be material to your evaluation of Summit Capital and the integrity of our management of your assets. We have no information that applies to this item.

Self-Regulatory Proceeding

Registered Investment Advisors are required to disclose all material facts regarding any Self-Regulatory Organization proceedings that would be material to your evaluation of Summit Capital and the integrity of our management of your assets. We have no information that applies to this item.

Item 10: Other Financial Industry Activities and Affiliations

There are currently no other financial industry activities or affiliations involving Summit Capital or its principals.

Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Summit has adopted a Code of Ethics designed to ensure that employees understand and honor their duty to place interests of investors ahead of their own. A copy of the Code of Ethics will be available to clients and prospective clients upon request.

All officers and employees of Summit have their accounts of their immediate family members (together the "Affiliated Accounts") managed by Summit. The same criteria are applied to the selection of portfolio securities for the Affiliated Accounts as are applied for the accounts of Summit's clients. Summit's officers and employees and their family members may hold securities held by Summit's clients. Securities transactions for the Affiliated Accounts are not aggregated with transactions for client accounts, and are not executed until all orders for clients' accounts have been executed and trading for client accounts is complete.

Item 12: Brokerage Practices

Summit recommends brokers or dealers to effect portfolio transactions. In doing so, consideration is given to the proven integrity and financial responsibility of the various firms as well as to their demonstrated execution experience and capability generally and in regard to particular markets or securities and to the competitiveness of the commission rates they charge. Currently all accounts managed by Summit are held in custody with Charles Schwab and all brokerage transactions are executed through Charles Schwab. If a client requests to custody the account at another brokerage firm, Summit will execute transactions through that broker-dealer.

Item 13: Review of Accounts

Client accounts are reconciled to broker statements on a monthly basis. Accounts are individually reviewed prior to any trading activity. James Onorato, President, or its investment advisor representative, reviews the accounts. Clients receive a report packet at the beginning of each calendar quarter that includes among other things portfolio holdings and cost basis information. Clients are encouraged to review this report and compare it to the statement they receive from their custodian.

Item 14: Client Referrals and Other Compensation

Economic Benefits

Summit Capital does not receive any compensation other than the compensation discussed in Item 5. There currently are no other arrangements, oral or in writing where it directly or indirectly receives compensation for client referrals.

Third Party Solicitors

Summit Capital may use, employ, or compensate non-employee (outside) consultants, individuals, and/or entities (Solicitors) for client referrals. If your investment advisor relationship is obtained through a Solicitor, you will receive a Solicitor Disclosure Form that will describe the solicitor relationship and the compensation earned by the Solicitor. Your fee will not increase because of the Solicitor relationship. This form will require you to sign the form acknowledging this relationship.

Beyond the disclosures provided in this Brochure, we do not receive any compensation from any third party in connection with providing investment advice to you.

Item 15: Custody

Summit does not have or take custody of any client funds and/or securities. As a result, Summit does not accept securities or forward securities to your brokerage firm or custodian. The only checks accepted as payable to Summit Capital, Inc. are those submitted for payment of advisory fees. You will not give us authority to withdraw securities of funds (other than for payment of advisory fees) from your account. We are deemed to have custody only due to the ability to deduct management fees in accordance with the advisory agreement, but we do not otherwise have any access to client assets.

Clients will receive statements directly from their broker dealer or custodian at least quarterly. Clients are urged to carefully review those statements and compare the custodial records to the reports that we provide them.

Item 16: Investment Discretion

Summit accepts discretionary authority to manage the assets in the client's account which is given via the client's written agreement. Summit will supervise and direct the investments and make all investment decisions for the Account. Summit will direct the sale, purchase or trade of any assets as it may deem appropriate, and the reinvestment or holding for reinvestment, of any proceeds of such sales or trades, as it may deem advisable. When using discretionary authority, Summit may act without Client's prior consent or prior notification, and may issue transaction instructions to the broker dealer and/or custodian. This is subject, to any limitations and restrictions Client may have imposed, or may later impose, by notifying Summit in writing.

Item 17: Voting Client Securities

We vote proxies of clients that have given us authority to do so. When Summit accepts voting authority for client securities, it will always seek to vote in the best interests of its clients. As a general rule, Summit votes consistent with management recommendations as this is consistent with why securities are purchased as the advisor believes in the company's management to lead the company. Clients of Summit may obtain the voting record of how we voted on client securities by contacting the firm at phone number or e-mail address listed on the cover page of this brochure. Clients may obtain a copy of the Summit proxy voting policies and procedures upon request.

Where Summit does not have voting authority, clients will receive proxies and proxy information or other solicitations about your securities from the account custodian. If you have questions about a particular solicitation, you can contact your representative for advice. You are not obligated to follow your representative's advice on voting your securities.

Item 18: Financial Information

Summit has never been the subject of a bankruptcy proceeding and there are no financial commitments that may hinder its ability to meet contractual and fiduciary commitments to clients.

Item 19: Requirement for State-Registered Advisors

Summit Capital is a SEC Registered Investment Adviser. This item is not applicable to Summit Capital, Inc.

Brochure Supplement (Form ADV, Part 2B)

**James Onorato
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This brochure supplement provides information about James Onorato that supplements the Summit Capital, Inc. Brochure (Form ADV Part 2A). You should have received a copy of that brochure. Please contact us at (216) 839-8444 if you did not receive the Summit Capital Brochure or if you have any questions about the contents of this supplement.

Additional information about James Onorato is available on the SEC's website at www.adviserinfo.sec.gov.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Summit Capital Inc. is a Registered Investment Adviser. Registration as a "Registered Investment Adviser" does not imply a certain level of skill or training.

January 1, 2024

Educational Background & Business Experience

Name, Age (Year of Birth)

James Onorato, 67 (1956)

Formal Education

- The Ohio State University, B.S. Business Administration, 1979
- Cleveland State University, M. B. A. – Finance, 1994

Business Background

- Summit Capital, Inc. – President/Portfolio Manager, 01/1998 - Present
- Ancora Securities, Inc. - Registered Representative, 04/2005 – 07/2005
- Samuels Chase & Co., Inc. - Registered Representative, 03/2003 – 07/2003
- B/D Holdings, Inc. (Ancora Securities) - Registered Representative, 01/2001 – 03/2003
- Maxus Securities Corp. - Registered Representative, 10/1983 – 12/2000

Disciplinary Information

Legal or Disciplinary Events

No information is applicable for this item for Mr. Onorato.

Criminal or Civil Action

There is no material information that is applicable for this item for Mr. Onorato.

Administrative Proceeding

No information is applicable for this item for Mr. Onorato.

Self-Regulatory Organization Proceeding

No information is applicable for this item for Mr. Onorato.

Other Proceeding

No information is applicable for this item for Mr. Onorato.

Other Business Activities

Investment-related Activities

Mr. Onorato does not receive any additional compensation from non-clients for providing advisory services.

Other Business or Occupation for Compensation

Mr. Onorato has no other business or occupation for compensation.

Additional Compensation

Economic Benefit

Mr. Onorato does not receive any additional compensation from non-clients for providing investment services.

Supervision

Describe Supervision

For activities of Summit Capital, Inc., Mr. Onorato is the senior officer and is not directly supervised by anyone.

Name, Title and Telephone Number of Supervisor

Not Applicable for Mr. Onorato.

Requirements for State-Registered Advisers

Additional Information Regarding Disciplinary Events

There are no additional material facts to disclose regarding disciplinary events for Mr. Onorato.

Bankruptcy

No information is applicable for this item for Mr. Onorato.

Brochure Supplement (Form ADV, Part 2B)

**David M. Yormick
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This brochure supplement provides information about David M. Yormick that supplements the Summit Capital, Inc. Brochure (Form ADV Part 2A). You should have received a copy of that brochure. Please contact us at (216) 839-8444 if you did not receive the Summit Capital Brochure or if you have any questions about the contents of this supplement.

Additional information about David Yormick is available on the SEC's website at www.adviserinfo.sec.gov.

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January 1, 2024

Educational Background & Business Experience

Name, Age (Year of Birth)

David M. Yormick, 54 (1969)

Formal Education

- Executive Certificate in Financial Planning
John Carrol University, University Heights, OH, 2006
- Canisius College, Buffalo, NY B.S. Finance/French, 1991

Business Background

- Summit Capital, Inc. – Investment Advisor Representative, 11/2019 - Present
- Bison Wealth Management, LLC - Principal & Investment Advisor Rep, 01/2003-12/2019
- Morgan Stanley (formerly Dean Witter) – Financial Advisor, 04/1997 – 01/2003

Disciplinary Information

Legal or Disciplinary Events

No information is applicable for this item for Mr. Yormick.

Criminal or Civil Action

There is no material information that is applicable for this item for Mr. Yormick.

Administrative Proceeding

No information is applicable for this item for Mr. Yormick.

Self-Regulatory Organization Proceeding

No information is applicable for this item for Mr. Yormick.

Other Proceeding

No information is applicable for this item for Mr. Yormick.

Other Business Activities

Investment-related Activities

Mr. Yormick is a licensed health and life insurance agent in the State of Ohio. The amount of time spent by Yormick on this activity is less than 10% of his time. From time to time, he will offer clients advice or products from this activity. Clients should be aware that these services pay a commission that are separate from advisory fees and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered

investment adviser. Summit Capital, Inc. always acts in the best interest of the client; including in the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of Summit Capital, Inc. in their capacity as a licensed insurance agent.

Other Business or Occupation for Compensation

Mr. Yormick has no other business or occupation for compensation.

Additional Compensation

Economic Benefit

Mr. Yormick does not receive any additional compensation from non-clients for providing investment services.

Supervision

Describe Supervision

For activities of Summit Capital, Inc., Mr. Yormick is directly supervised by James Onorato. Mr. Onorato reviews accounts handled by Mr. Yormick to make sure that accounts' activities are appropriate for the clients' investment objective and individual situation. Mr. Onorato reviews accounts and personal securities transactions to make sure Mr. Yormick is in compliance with the Summit Capital Code of Ethics.

Name, Title and Telephone Number of Supervisor

James Onorato, President, (216) 539-8444

Requirements for State-Registered Advisers

Additional Information Regarding Disciplinary Events

There are no additional material facts to disclose regarding disciplinary events for Mr. Yormick.

Bankruptcy

No information is applicable for this item for Mr. Yormick.

Brochure Supplement (Form ADV, Part 2B)

**Gary E. Friedman
Summit Capital, Inc.
29425 Chagrin Blvd. # 350
Pepper Pike, OH 44122**

**Summit Capital, Inc.
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Pepper Pike, OH 44122**

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This brochure supplement provides information about Gary Friedman that supplements the Summit Capital, Inc. Brochure (Form ADV Part 2A). You should have received a copy of that brochure. Please contact us at (216) 839-8444 if you did not receive the Summit Capital Brochure or if you have any questions about the contents of this supplement.

Additional information about Gary Friedman is available on the SEC's website at www.adviserinfo.sec.gov.

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Summit Capital Inc. is a Registered Investment Adviser. Registration as a "Registered Investment Adviser" does not imply a certain level of skill or training.

January 1, 2024

Educational Background & Business Experience

Name, Age (Year of Birth)

Gary E. Friedman, 62 (1961)

Formal Education

- The Ohio State University, B.S. Accounting, 1984

Business Background

- Summit Capital, Inc. – Vice President & Investment Advisor Representative, 04/2009 - Present
- Gary E. Friedman. – Investment Consultant, 07/2000 – 04/2009
- Independence Capital Co., Inc. - Registered Representative, 08/1994 – 06/2000
- Compulife Investor Services, Inc. - Registered Representative, 09/1995 – 12/1996
- Liberty Securities Corp. - Registered Representative, 07/1992 – 05/1994

Disciplinary Information

Legal or Disciplinary Events

While employed as a registered representative of a NASD broker dealer, Mr Friedman sold 35 unregistered promissory notes from November 1997 to June 1998. This activity was not approved by his NASD broker dealer employer.

This issue caused the Ohio Division of Securities issued a cease and desist order in November 2000 related to this activity and revoked his Investment Advisor Representative License in December 2000. This event also triggered the revocation of Mr. Friedman's Insurance license by the Ohio Department of Insurance in July 2002.

This information is disclosed on the Securities and Exchange Commission (SEC) Investment Advisor Public Disclosure Website.

Criminal or Civil Action

There is no material information that is applicable for this item for Mr. Friedman.

Administrative Proceeding

No information is applicable for this item for Mr. Friedman.

Self-Regulatory Organization Proceeding

No information is applicable for this item for Mr. Friedman.

Other Proceeding

No information is applicable for this item for Mr. Friedman.

Other Business Activities

Investment-related Activities

Mr. Friedman does not receive any additional compensation from non-clients for providing advisory services.

Other Business or Occupation for Compensation

GEF Financial, Inc. (Est. 2019) - Mr. Friedman is the sole owner of this company. The company exists to collect fees and compensation earned by Mr. Friedman.

420 Cleveland, LLC (Est. 2018) – Mr. Friedman is 4% owner of the LLC. This company was formed by a group to make an investment in another company. The LLC has sold the investment and is in the process of being dissolved and will be closed out once the final tax filing has been completed.

Mr. Friedman has no other business or occupation for compensation.

Additional Compensation

Economic Benefit

Mr. Friedman does not receive any additional compensation from non-clients for providing investment services.

Supervision

Describe Supervision

For activities of Summit Capital, Inc., Mr. Friedman is directly supervised by James Onorato. Mr. Onorato reviews accounts handled by Mr. Friedman to make sure that accounts' activities are appropriate for the clients' investment objective and individual situation. Mr. Onorato reviews accounts and personal securities transactions to make sure Mr. Friedman is in compliance with the Summit Capital Code of Ethics.

Name, Title and Telephone Number of Supervisor

James Onorato, President, (216) 539-8444

Requirements for State-Registered Advisers

Additional Information Regarding Disciplinary Events

There are no additional material facts to disclose regarding disciplinary events for Mr. Friedman.

Bankruptcy

Mr. Friedman filed for bankruptcy protection under Chapter 7 on December 19, 2001. Mr. Friedman was discharged from bankruptcy on April 17, 2002.

Brochure Supplement (Form ADV, Part 2B)

**Regina M. Ryan
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This brochure supplement provides information about Regina M. Ryan that supplements the Summit Capital, Inc. Brochure (Form ADV Part 2A). You should have received a copy of that brochure. Please contact us at (216) 839-8444 if you did not receive the Summit Capital Brochure or if you have any questions about the contents of this supplement.

Additional information about Regina M. Ryan is available on the SEC's website at www.adviserinfo.sec.gov.

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Summit Capital Inc. is a Registered Investment Adviser. Registration as a "Registered Investment Adviser" does not imply a certain level of skill or training.

January 1, 2024

Educational Background & Business Experience

Name, Age (Year of Birth)

Regina M. Ryan, 78 (1945)

Formal Education

- University of Dayton, B.S. Elementary Education, 1967
- University of Evansville, M.A. Education Administration, 1978

Business Background

- Summit Capital, Inc. – Investment Adviser Representative, 01/2014 - Present
- America Northcoast (Ancora) Securities, Inc. - Registered Representative, 09/2001 – 01/2014
- FifthThird/Maxus Securities – Registered Representative, 02/2000 – 08/2001
- B/D Holdings, Inc. (Ancora Securities) - Registered Representative, 05/1999 – 02/2000
- Maxwell Securities Corp. – Registered Representative, 09/1996 – 12/1998
- Maxus Securities Corp. - Registered Representative, 09/1986 – 08/1996

Disciplinary Information

Legal or Disciplinary Events

No information is applicable for this item for Ms. Ryan.

Criminal or Civil Action

There is no material information that is applicable for this item for Ms. Ryan.

Administrative Proceeding

No information is applicable for this item for Ms. Ryan.

Self-Regulatory Organization Proceeding

No information is applicable for this item for Ms. Ryan.

Other Proceeding

No information is applicable for this item for Ms. Ryan.

Other Business Activities

Investment-related Activities

Ms. Ryan does not receive any additional compensation from non-clients for providing advisory services.

Other Business or Occupation for Compensation

Ms. Ryan has no other business or occupation for compensation.

Additional Compensation

Economic Benefit

Ms. Ryan does not receive any additional compensation from non-clients for providing investment services.

Supervision

Describe Supervision

For activities of Summit Capital, Inc., Ms. Ryan is directly supervised by James Onorato. Mr. Onorato reviews accounts handled by Ms. Ryan to make sure that accounts' activities are appropriate for the clients' investment objective and individual situation. Mr. Onorato reviews accounts and personal securities transactions to make sure Ms. Ryan is in compliance with the Summit Capital Code of Ethics.

Name, Title and Telephone Number of Supervisor

James Onorato, President, (216) 839-8444

Requirements for State-Registered Advisers

Additional Information Regarding Disciplinary Events

There are no additional material facts to disclose regarding disciplinary events for Ms. Ryan.

Bankruptcy

No information is applicable for this item for Ms. Ryan.

Form ADV Part 3 – Client Relationship Summary

Date: 10/01/2021

Item 1: Introduction

SUMMIT CAPITAL, INC. is an investment adviser registered with the Securities and Exchange Commission offering advisory accounts and services. Brokerage and investment advisory services and fees differ, and it is important that you understand the differences. This document gives you a summary of the types of services and fees we offer. Please visit www.investor.gov/CRS for free, simple tools to research firms and for educational materials about broker-dealers, investment advisers, and investing.

Item 2: Relationships and Services

Questions to ask us: Given my financial situation, should I choose an investment advisory service? Why or why not? How will you choose investments to recommend to me? What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?

What investment services and advice can you provide me? Our firm primarily offers the following investment advisory services to retail clients: portfolio management (we review your portfolio, investment strategy, and investments); financial planning (we assess your financial situation and provide advice to meet your goals). As part of our standard services, we typically monitor client accounts on a monthly basis. Our firm offers discretionary services, and the investment advisor representative makes decisions regarding the purchase or sale of investments. We limit the types of investments that are recommended since not every type of investment vehicle is needed to create an appropriate portfolio. Our firm has a \$100,000 minimum account size for individual/joint account clients. Please also see our Form ADV Part 2A ("Brochure"), specifically Items 4 & 7.

Item 3: Fees, Costs, Conflicts, and Standard of Conduct

Questions to ask us: Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me? How might your conflicts of interest affect me, and how will you address them?

What fees will I pay? Our fees vary depending on the services you receive. Additionally, the amount of assets in your account affects our advisory fee; the more assets you have in your advisory account, the more you will pay us and thus we have an incentive to increase those assets in order to increase our fee. Our standard fee schedule is based on market value of the client's portfolio based on a fee tier. You pay our fees even if you do not have any transactions and the advisory fee paid to us generally does not vary based on the type of investments selected. Please also see Items 4, 5, 6, 7 & 8 of our Brochure.

Some investments (e.g., mutual funds, variable annuities, etc.) impose additional fees (e.g., transactional fees and product-level fees) that reduce the value of your investment over time. The same goes for any additional fees you pay to a custodian. Additionally, you will pay transaction fees, if applicable, when we buy or sell an investment for your account. **You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of**

Form ADV Part 3 – Client Relationship Summary

Date: 10/01/2021

money you make on your investments over time. Please make sure you understand what fees and costs you are paying. Please also see our Brochure for additional details.

What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?: *When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours.* At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means.

- Our custodians provide benefits related to trading, research, compliance, marketing, education, and practice management support. This presents a conflict of interest, because our receipt of their support makes us more inclined to continue using and recommending them.
- The more assets you have in your advisory account, including cash, the more you will pay us. Therefore, we have an incentive to increase the assets in your account to increase the amount we earn (i.e., recommending that you rollover your retirement plan account or transfer assets to our management).

How do your financial professionals make money? Primarily, we and our financial professionals receive cash compensation from the advisory services we provide to you because of the advisory fees we receive from you. This compensation may vary based on different factors, such as those listed above in this Item. Please also see Item 10 of our Brochure for additional details.

Item 4: Disciplinary History

Questions to ask us: *As a financial professional, do you have any disciplinary history? For what type of conduct?*

Do you or your financial professionals have legal or disciplinary history? Yes. Individuals that have legal and disciplinary events, these are disclosed on Form ADV, Part 2B. Visit <https://www.investor.gov/> for a free, simple search tool to research us and our financial professionals.

Item 5: Additional Information

Questions to ask us: *Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?*

For additional information on our advisory services, see our Brochure available at <https://adviserinfo.sec.gov/firm/summary/121335> and any individual brochure supplement your representative provides. If you have any questions, need additional up-to-date, or want another copy of this Client Relationship Summary, then please contact us at 216-539-8444.