

This document (Notice) includes a description of the services that Summit Brokerage Services, Inc. (“Firm” or “We”) is providing to you with respect to your retirement plan (Plan) and the compensation that we receive in connection with these services.

### **The Firm**

The Firm provides certain services on behalf of your Plan as described below in “Description of Services.” These services are provided by your financial advisor as a registered representative of the Firm.

### **Description of Services**

At your direction, the Firm has opened and maintains a brokerage account on behalf of the Plan. If the Plan is a defined contribution plan with more than one participant, a separate brokerage account has been opened for each participant.

We provide investment-related consulting services and other related assistance that are intended to assist you with your duties in your capacity as the sponsor and fiduciary of your Plan. These services (Investment-Related Services) entail providing assistance with your management of the investments held through the Plan’s brokerage account and providing certain related brokerage services, such as effecting securities transactions in connection with the Plan’s investments through its brokerage account.

Our services may also include assisting you with maintaining an investment policy statement for the Plan, education with respect to available investments that can be held through the Plan’s brokerage account, assisting you with monitoring the selected investments, and providing education for your employees. We may also provide related ancillary assistance concerning the Plan’s ongoing administration and operation. All Investment-Related Services are non-discretionary in nature, and we do not have discretionary investment management authority or control over the Plan’s assets or any participant’s investments under the Plan.

### **Fiduciary Status**

The Firm provides brokerage services to the Plan as a fiduciary within the meaning of Section 3(21) of the Employee Retirement Income Security Act of 1974, as amended (ERISA). This section regarding the Firm’s fiduciary status under ERISA (ERISA Fiduciary) will be interpreted and administered in accordance with the DOL “fiduciary” definition regulations (DOL Fiduciary Regulation) issued by the DOL on April 8, 2016, as well as amendments and guidance promulgated thereunder. The Firm’s ERISA Fiduciary Status is dependent on the legal validity of the DOL Fiduciary Regulation. In the event the DOL Fiduciary Regulation is retroactively repealed, vacated or deemed invalid for any reason or delayed in whole or in part, then the above ERISA Fiduciary disclosure shall become null and void, from its effective date, as if it had never been issued. The status of the Firm as an ERISA Fiduciary is subject to and limited by the scope of the DOL Fiduciary Regulation, as it may be in effect from time to time.

### **Direct Compensation Payable to the Firm from the Plan**

The Firm charges fees and other related expenses for maintaining the Plan’s brokerage account (“Brokerage Related Fees”). The Firm uses these payments to compensate Wells Fargo Clearing Services, LLC (whose trade name is “First Clearing”) for performing custody and related securities clearing services for the Plan’s brokerage account as described below in “Compensation Paid Among Related Parties.” The Firm’s Brokerage-Related Fees are provided in the “FCC Brokerage-Related Charges and Fees” table at the Firm’s Internet website at the following website address: <http://www.summitbrokerage.com/408b2/brokerage>.

The Firm charges commissions (“Commissions”) for effecting securities transactions through the Plan’s brokerage account. The Firm uses a portion of these payments to compensate First Clearing for performing trade execution and related securities clearing services for the Plan’s brokerage account as described below in “Compensation Paid Among Related Parties.” The Firm’s current Commissions schedule is provided in the “Representative Commission Schedule” available at the website address [stated above](#)

Additionally, as described in the Brokerage Related Fees schedule, the Firm charges the following mutual fund fees (collectively the “Mutual Fund Fees”): (i) an accommodation fee for purchases and sales of no load mutual funds and (ii) a liquidation fee for sales of any mutual fund other than a no-load mutual fund.

**Indirect Compensation Payable to the Firm from Sources Other Than the Plan or the Plan Sponsor**

As a registered broker-dealer, the Firm may receive payments from any investment funds (Funds) held by the Plan as indirect compensation for the Investment-Related Services provided on behalf of the Plan, including certain related brokerage services, such as effecting securities transactions in connection with investments in the Plan’s investment options. Funds may include mutual funds and other similar investment products.

When the Plan invests in a Fund that is a mutual fund, such compensation may include 12b-1 fees paid by the Funds for providing distribution-related services, as well as administrative and informational services, as applicable, to the Plan. The 12b-1 fees paid by an applicable mutual fund are described in its prospectus. Depending on the particular share class, the purchase of Fund shares by the Plan may be subject to a front-end sales charge resulting in additional compensation for the Firm as described in the Fund’s prospectus. (Investments in the Fund may be subject to other charges that are not payable to the Firm, such as a contingent deferred sales charge payable to a Fund affiliate as described in the Fund’s prospectus.) For more information, please refer to the relevant mutual fund prospectuses previously provided to you and which are generally available at the relevant Fund’s website.

When the Plan invests in any Fund (which may or may not be a mutual fund), the Firm may receive separate compensation payable from the issuer or manager of the Fund or one of its affiliates (Manager). Such compensation, also referred to as revenue sharing, is paid from the Manager’s assets and does not reduce the amount invested by the Plan or the Plan’s investment earnings. The amount of any revenue sharing payments from the Manager of any of the Plan’s Funds is described in the “Revenue Sharing Payment Table.”

**Revenue Sharing Payment Table**

<b>One-time Payment Based on Sales Amount (bps* range)</b>	<b>Name of Fund Family</b>
5 – 10 bps	Allianz Global Investors Fidelity Prudential Investments Pacific Life Invesco PIMCO Putnam

<b>Ongoing Annual Payment Based on Assets (bps*)</b>	<b>Name of Fund Family</b>
3 – 9 bps	Allianz Global Investors Blackrock Fidelity Franklin Templeton John Hancock Lord Abbett Pacific Life PIMCO Putnam
10 – 15 bps	JP Morgan Columbia Management Deutsche Asset Management Eaton Vance Federated New York Life Mainstay Oppenheimer Goldman Sachs Invesco Ivy Prudential Investments Natixis Neuberger Berman Pioneer Principal Virtus Investment Partners Voya Investment Management

\* Revenue Sharing is calculated using basis points. One basis point equals .01%. For example 10 bps on \$100,000 of assets equals \$100.

The estimated rate of revenue sharing payments received from each applicable fund family is generally indicated in the table above. These payments may not be made, or may be paid at a lower rate than as noted above, in the case of certain share classes, asset classes or specific fund types, such as money market funds. Additional information is available upon request as may be required by an authorized fiduciary of the Plan for regulatory reporting purposes. In addition to the payment rate disclosed in the table above, some

providers may make a supplemental payment of \$10 per trade to defray the Firm's cost of engaging First Clearing to effect the applicable mutual fund transaction on the Firm's behalf.

The Firm may also receive certain revenue sharing payments from third-party firms, including plan recordkeeping platforms as well as investment managers of mutual funds and the issuers of annuities. These firms participate in activities that are designed to help facilitate the distribution of their products and services, such as marketing activities and educational programs, including attendance at conferences and presentations to the Firm's financial advisors. These revenue sharing payments are in the form of a fixed dollar amount that does not depend on the amount of the Plan's investment in any product or utilization of any third-party firm's administrative services. Such third-party firms may also pay the Firm's expenses, or provide non-cash items and services, to facilitate training and educational meetings for the Firm's financial advisors, which similarly do not depend on the amount of the Plan's investment in any product or utilization of any third-party firm's administrative services.

### **Compensation Paid Among Related Parties**

As described in "Direct Compensation Payable to the Firm from the Plan," the Firm receives Brokerage-Related Fees for maintaining the Plan's brokerage account, Commissions and other fees for effecting securities transactions, and Mutual Fund Fees for effecting applicable mutual fund transactions.

In order to provide the applicable brokerage services, the Firm relies on an unaffiliated subcontractor, First Clearing, to perform trade execution, clearing and other similar services for the Plan's brokerage account. A portion of the Brokerage-Related Fees (other than the Mutual Fund Fees) and Commissions received by the Firm, as described in the schedules available at the website address stated above, are used to compensate First Clearing for its services.

As described in "Indirect Compensation Payable to the Firm from Sources Other Than the Plan or the Plan Sponsor," as applicable, the Firm may receive fees from any of the Plan's Funds and receive revenue sharing payments from the Manager of a Fund. These payments generally are not shared with any entities affiliated with Firm or with any other entities, however as described in the "Revenue Sharing Payment Table" above, the Firm may receive a supplemental payment of \$10 per trade from certain investment providers to defray the Firm's cost of engaging First Clearing to effect the applicable mutual fund transaction on the Firm's behalf.

### **Compensation for Termination of Services**

The compensation that the Firm expects to receive in connection with the termination of its Investment-Related Services on behalf of the Plan includes a brokerage fee for outgoing account transfer: \$125.

### **Manner of Receipt of Compensation**

As described in "Direct Compensation Payable to the Firm from the Plan," the Firm receives Brokerage-Related Fees for maintaining the Plan's brokerage account for effecting securities transactions, and Mutual Fund Fees for effecting applicable mutual fund transactions.

The amount of any Brokerage Related Fees will be deducted directly from the Plan's assets in its brokerage account, except as otherwise agreed to in writing with you. The amount of any Commissions and Mutual Fund Fees will be deducted directly from the Plan's assets in its brokerage account at the time of the applicable transaction.

With regard to any 12b-1 fees and, if applicable, any front-end sales load payable to the Firm from the Funds, such amounts will be deducted directly from the Fund's assets automatically. Any revenue sharing payments made to the Firm by a Fund's Manager are paid directly from the assets of the Manager, and are not deducted from the Fund's assets or the Plan's account.

### **Important Information**

The information included in this notice, including but not limited to the statements under "Description of Services and Direct Compensation Payable to the Firm from the Plan," is not intended to replace or modify any existing or prospective agreement relating to the Plan. This notice is provided for informational purposes only, and it should not be relied upon as a legal contract or guarantee for any service that is or will be provided by the Firm or any affiliate. For any questions relating to the information provided in this notice, please contact your Plan's financial advisor.