

**Item 1      Cover page of MacNealy Hoover Investment Management Brochure**

**ADV Part 2A**

MacNealy Hoover Investment Management, Inc.  
200 Market Ave. North Suite 200  
Canton , Ohio    44702

Contact person:   Harry MacNealy C.E.O. and C.C.O.  
Prepared 01/20/2012

This brochure provides information about the qualifications and business practices of MacNealy Hoover Investment Management, Inc. If you have any questions about the content of this brochure, please contact me at 330-454-1010 , 800-765-8615 , and /or macnealy@cantonmetro.net 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.

While MacNealy Hoover Investment Management, Inc. is a registered investment management firm, that registration does not imply a certain level of skill or training. Throughout the rest of this brochure MacNealy Hoover Investment Management Inc. may be referred to as MHIM.

Additional information about MacNealy Hoover Investment Management, Inc. also is available at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Item 2      Material Changes**

Since the last update of our Form ADV. 2 on February 2, 2011, we have made a few spelling and grammatical corrections throughout our brochure. Additionally, we have updated our top ten equity holdings and our number of clients and dollars under investment management in Section 4 Advisory Business. None of these changes are material in nature.

On page 9, we expanded our explanation of never intentionally executing cross trades. This was not a significant change.

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**Item 4      Advisory Business**

What services does your firm provide, how long have you been in business, and who are your owners ?

MacNealy Hoover Investment Management , Inc. was founded as an Ohio corporation in June of 1999 . Our sole purpose is to provide full time professional investment management of our clients' investment assets.

Harry C.C. MacNealy is the Chief Executive Officer and Chief Compliance Officer. He owns 75 % of the corporation.

Charles H. Hoover serves as President and he owns 25 % of the corporation.

No one else has any ownership interest.

The Company has never had any debt.

MHIM manages each portfolio individually. We attempt to tailor your account to meet your unique investment goals and objectives. In identifying these objectives we consider your risk tolerance, liquidity needs, income needs, tax ramifications, time horizon, return objectives and communication preferences.

Investment vehicles that **may be** included in your portfolio:

Common stocks

Preferred stocks

ADR's (American Depository Receipts) shares of a company based outside the U.S  
but traded in the U.S. markets

Mutual funds

ETF's (exchange traded funds)

Warrants

U.S. Government and Agency bonds

Corporate bonds

Municipal bonds

Certificates of Deposits

Money market funds

We **DO NOT** invest your money in :

Hedge funds

Limited partnerships

Individual commodities

We **DO NOT** sell securities short (Sell stocks that you don't own by borrowing them and selling them in anticipation of a price drop)

We only use options if you **SPECIFICALLY** request that we do. We believe such use has limited effectiveness and could lead to greater potential losses and higher trading costs.

As of December 31, 2011 our ten largest equity holdings in dollar value are as follows:

Exxon Mobil  
Chevron  
Procter & Gamble  
Johnson & Johnson  
Berkshire Hathaway  
General Electric  
IBM  
Conoco Philips  
National Bancshares  
Abbott Laboratories

These stocks represented about 33 % of the total value of our clients' stock holdings.

You may impose restrictions on investing in certain securities or types of securities. ( For example, some clients, for moral or religious reasons, may not want to invest in companies that produce cigarettes or alcohol.) If we feel the restrictions will negatively impact the performance of your portfolio, we will notify you.

MHIM **is not** involved in any wrap fee programs.

As of December 31, 2011 assets under management by MHIM were as follows:

	89 discretionary account relationships	\$ 183,292,881
	4 non-discretionary relationships	\$ 2,115,278
Total	93 account relationships	\$ 185,408,159

A relationship may include multiple accounts.

## Item 5 Fees and Compensation

How are we paid for our services ?

Our fee schedule is based upon the value of the securities and cash under supervision at the end of the preceding calendar quarter and will be calculated at the following rates unless modified by mutual agreement.

- 0.75 % per annum on the first million dollars
- 0.50 % per annum on the next two million dollars
- 0.40 % per annum on the next two million dollars
- 0.35 % per annum on all assets over five million dollars

Unless mutually agreed otherwise, MHIM requires a minimum account relationship of \$ 500,000.

We have some accounts that have negotiated lower rates and/or pay a predetermined flat rate per quarter.

Fees will be payable quarterly in advance and will be calculated on the total market value of all related accounts. The initial fee will be prorated to the end of the current quarter. You can choose to have your fees deducted from your accounts or to pay us separately.

The investment agreement may be terminated by either you or by us at any time, without penalty, upon written notice effective upon receipt. In the event of such termination, fees will be reimbursed to you on a pro rata basis, the unearned portion of the prepaid fee, calculated from the start of the quarter to the date your/our actual receipt of termination notice.

### Layering of fees

All mutual funds, money market funds, and ETF's have **internal** management/operating fees. When MHIM charges an investment management fee on these investment vehicles, you are in essence paying twice for the management of assets.

MHIM **does not** receive any brokerage commissions.

MHIM **does not** receive any compensation from mutual funds, ETF's or money market funds.

MHIM **does not** receive any compensation other than our management fees.

## Item 6 Performance Based Fees

Are we compensated on a **share** of the gain in a client's account ?

MHIM **does not** receive any compensation other than what is listed above in our fee schedule. If you are paying your fees as a percentage of assets under management, obviously MHIM will earn proportionally more if your account rises and proportionally less if it declines. However, under **NO** circumstances does MHIM share in the gain of your account as a performance incentive on top of a management fee.

## Item 7 Types of Clients

What are the general characteristics of our client base ?

As of December 31, 2011, MHIM had 93 account relationships. The **majority** of these clients are high net worth individuals. (financial assets in excess of \$ 1,000,000 ) We may manage their trust, IRA's, joint accounts etc. We also manage several profit-sharing and retirement plans . Less than 5 % of our clients are not- for- profit organizations. While each client has their own unique investment objectives, our clients generally prefer a traditional, conservative approach to generating income and growth, rather than more speculative investment alternatives. To paraphrase a client, " We have made our money. Your job is to minimize our losses and yet keep pace with inflation."

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

How do we go about managing your assets ?

As we mentioned in the Advisory Business section, we manage each account individually so that we can best meet your unique investment objectives. It is important for us to understand:

your risk tolerance	How great of a loss are you willing to accept ?
your liquidity needs	How much money do you need and how quickly do you need it ?
your income needs	Do you need income from your investments to maintain your lifestyle?
your tax ramifications	What is your income tax rate ? Do you have any tax loss carry forwards or other situations which could affect the amount of taxes you owe ?
your time horizon	How long can you keep this money invested and/or what are you trying to accomplish by when?
your return objectives	What amount of increase in your money do you want or expect ?
your communications preferences	How often do you want us to talk with you ? What kinds of information do you want us to provide? Do you want your information delivered in paper form or delivered electronically ?

Once we understand these factors, we evaluate if the way we invest is a good match for you. If we don't believe it is, we won't accept you as a client.

**We must emphasize that you could potentially experience a loss in any investment we make for you.**

We begin our management process by examining how various combinations of stocks, bonds, and cash equivalents have performed over long periods of time. Although there is no guarantee that these combinations will perform in the same manner in the future, we want to know what was the best case annual return, worst case annual return, and average annual return. Based upon this information and your risk tolerance and investment objectives, we will suggest a range of how much we believe should be in each asset class.

After determining these ranges, we try to further minimize your risk by diversifying your portfolio into various industry sectors and companies. We typically don't invest more than 5% in any individual stock or more than 35 % in any industry no matter how much potential we believe exists. In market declines, even companies with high quality balance sheets and great growth prospects can drop significantly in value.

Most of the stocks we buy are of larger, well-established companies with track records of share price appreciation and dividend payments. We also have invested in many small Ohio banks and thrifts. These financial stocks tend to be less liquid than their larger counterparts and may experience wide fluctuations in value. Large purchases or sales of these stocks may lead to larger share price movements than most stocks that trade on the New York Stock Exchange.

We intend for you to own most of the stocks we purchase for your account for several years. (Low portfolio turnover) We consider selling when the price of the stock has risen to levels that make other equities appear to have more upside potential or less downside. Factors we consider in making this decision are the price of the stock compared to its earnings, its competitive advantage, its dividend yield, earnings or market share growth, and its vulnerability to economic cycles.

We also consider selling if there has been a change in any of the factors that led us to buy the stock in the first place. Examples of sell criteria would be a deterioration in its financial strength, a change in its business strategy or management team, or irresponsible use of capital.

In analyzing stocks we rely upon:

- public information posted on the SEC website,
  - ( annual reports 10 Q, proxies 14A,
  - earnings or material event announcements 8 K,
  - insider buying or selling 4 A, )
- independent research such as Value Line or Standard and Poor's,
- various publications such as Barron's or the Wall Street Journal, and
- numerous internet sites detailing company information

Almost all of the bonds we purchase are investment grade, ( rated BBB+ or higher by Moody's or S & P rating agencies) and less than ten years in maturity. Since no can accurately predict interest levels, we stagger the maturities of these bonds so you have money coming due in several different timeframes to reinvest. This minimizes interest rate risk. ( It prevents all of your money coming due when rates are exceptionally low, but also prevents you from locking in at the highest rates. ) The longer the maturity of any bond, the greater the fluctuation in value as interest rates change. If rates decline

after you purchase a bond, and you sell before maturity, you make recognize a gain. Conversely, if rates rise after you purchase a bond , and you sell before maturity, you may suffer a loss of value.

We generally hold bonds until maturity . We would consider selling if there is a deterioration in in the credit worthiness of the bond or if other investment alternatives offer superior upside potential.

When we invest in tax free municipal bonds for you, we consider your Federal and State income tax rates. We then compare the taxable equivalent rate to a C.D. or U.S. Treasury bond of similar maturity to determine if you are being compensated adequately for taking the risk of investing in an investment vehicle not backed by the U.S. Government.

Most of the municipal bonds we buy are general obligation bonds or essential services bonds.

General obligation bonds are supported by the tax revenue that has been voted upon by the citizens of the municipality. These bonds may be rated as highly as AAA or may be unrated. Beyond the rating we consider the municipality's ability to pay. We may consider the OMAC (Ohio Municipal Advisory Council) report, unemployment rate in the area, and number of homes in foreclosure. However, our evaluation does not guarantee against a default and loss of your money.

Essential services bonds are supported from the revenue generated from people paying their water, sewer, and electric bills. These utilities are generally the last bill that people will not pay. However in tough economic times, people may not pay these bills. We analyze historical information which details how many times the revenue exceeds the debt, but there is no guarantee that you won't lose money in such an investment.

We do not buy municipal bonds issued by hospitals or nursing facilities unless you specifically direct us. In this case we will give you an assessment of the risk of such bond defaulting on payment.

#### **Item 9      Disciplinary Information**

Has there ever been any legal or disciplinary actions against our firm or its principals ?

There **NEVER** has been any legal or disciplinary action against our firm or either of its principals. There are **NO** pending actions.

#### **Item 10      Other Financial Industry Activities and Affiliations**

Are we associated in any other business or activity within in the financial area ?

We are **NOT** associated in any other business activity within the financial industry.

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

What are the principles that guide our business, what conflicts may exist, how do we insure that your interests come first ?



MacNealy Hoover Investment Management has adopted a Code of Ethics that all of its employees must thoroughly understand and follow. This Code is designed, not only, to comply with Rule 204-2 and Rule 17J-1 of the Investment Company Act of 1940, but also to preserve the integrity and reputation of MHIM. A **complete** copy is available to you upon request, but the following information summarizes its content:

All employees must abide by all applicable local, state, and federal law, as well as, all securities law.

Client confidentiality is of paramount importance and safeguards are in place to insure it is preserved.

As Chief Executive Officer and Chief Compliance Officer, Harry MacNealy is responsible for establishing and enforcing policies.

Harry MacNealy and Charles Hoover bear a special responsibility for promoting integrity throughout MHIM and have adopted an Executives' Code of Ethics which outlines principles and responsibilities governing professional and ethical conduct.

**At all times the interests of our clients must come first !**

Under **no** circumstance does any employee of MHIM recommend securities to you in which they have a material financial interest and would benefit from your investment.

We **do** invest in many of the same securities that we recommend to our clients. Because we believe strongly in the investment advice we provide to you, we also are proud to invest our own money in those assets. We don't feel the creation of blackout periods in which we are not permitted to buy or sell really accomplishes anything. Consequently we geared our trading policy to preserve integrity as follows:

MHIM personnel must not intentionally sell securities on the same day we are buying the same securities for clients.

MHIM personnel must not intentionally buy securities on the same day we are selling the same securities for clients.

When MHIM personnel buy/sell securities, their execution prices can never be intentionally better than our client's executions for that day.

( The word intentionally is used because it possible, though extremely rare, that a client could call and request a DIRECTED order for their account after a MHIM personnel trade had been executed. )

MHIM personnel must never be involved in any front running and/or early exit strategies. The critical factors in determining appropriateness are:

Did the personnel intend to gain a financial advantage over clients ?

Would it even appear to anyone that the trade would provide an advantage ?

All employees must certify their trades on a quarterly basis. Harry MacNealy and Kellie Hill compare these trades with all transactions in those timeframes for compliance with our policy.

MHIM never **intentionally** executes cross trades. ( Selling from one client's account and simultaneously buying in another client's account.) There may be times when for tax purposes or liquidity needs a security may be sold for a client in the open market on the same day that the same security is purchased for another client.

## **Allocation Policy**

### **IPO allocation**

MHIM does not engage in the purchase of any Initial Public Offering unless you specifically request that we attempt to get a certain number of shares of the stock. If multiple clients make requests, and the issue is oversubscribed, the shares will be allocated as a percentage of the number requested.

MHIM personnel are not permitted to engage in an IPO.

### **Small local banks**

Due to the relatively low trading volume of these stocks, MHIM often enters multiple orders at specific prices. If **market** orders for large quantities were entered, this could potentially distort the stock price. Consequently, some orders may not fill in their entirety. This may lead to order quantities and transaction costs that may not be as cost efficient as a larger stock that trades on the New York Stock Exchange or NASDAQ market.

Unless specifically approved by the Office of the Thrift, no person and/or investment manager with full discretion and voting power can acquire more than 9.99 % of all the outstanding shares of a thrift. If we approach this number, you may not be able to buy shares unless MHIM gains such approval or unless you retain voting power and establish the account as a non-discretionary account.

### **Bunching of orders and block trades**

There may be times when MHIM determine that it is in your best interest to participate in bunched trades or block trades. When we do this, you and all other participating clients will receive the average share price of the transaction. If you don't have your assets in a Charles Schwab account you may not be able to participate in the benefits of these trades. Additionally, you may not be able to participate in some of the fixed income and equity opportunities that are enabled through Prime Broker.

### **Partial fills**

If the quantity that is executed on a block trade is less than the quantity that we wanted for our clients, you may not receive your full amount. In making this allocation we may not always do this on a pro-rata basis. Factors we consider, but are not limited to, are your sector weighting, security weighting, asset allocation, appropriateness for the rest of the size of your holdings, and the amount of uninvested money in your account. The guiding principle of the allocation is to be fair to all concerned. We keep records of all the allocations to provide documentation of impartiality.

MHIM makes every attempt to execute transactions for you in the most cost efficient order quantity, but you may receive partial fills on any transaction. These partial fills may result in higher transaction costs than would be associated with the execution of a full order quantity.

MHIM personnel are not permitted to receive any allocation of partially filled orders.

### **Pre-emptive rights**

Sometimes companies permit shareholders to buy an additional number of shares of stock at a specific price that may be lower than the current market price. Since we may also own shares in this company, MHIM employees as shareholders, are permitted to exercise their rights. This does not disadvantage you.

**To summarize, your interests must always come first !**

## **Item 12            Brokerage Practices**

How are brokers chosen, what commissions are paid, and do we gain any benefit from these selections ?

MHIM always ask clients for their preference in selecting their custodian and executing broker. We certainly honor any such preferences and will explain execution/commission differences that may result from their choices. If no preference is indicated, we may recommend that clients establish brokerage accounts with the institutional division of Charles Schwab & Co. We emphasize that MHIM is in NO way affiliated with Charles Schwab. Since MHIM has client assets in excess of \$ 10,000,000 at Schwab, we have access (at no fee) to an institutional trading platform, software, and back office assistance ( etc.) that we feel helps in the maintenance and administration of all client accounts. To insure our clients are not captive to Schwab, we may execute trades at another brokerage firm and have the securities transferred into their Schwab accounts if there is an economic advantage. ( lower transaction costs, greater availability of bonds, higher yields on similar bonds, etc.) To qualify for this type of arrangement ( Prime Broker) you must have a minimum of \$ 100,000 in your Schwab account . Schwab charges \$ 25 fee per trade for these transactions.

## **Item 13            Review of Accounts**

How frequently do we review and/or monitor your account ?

All of our clients' accounts are reviewed by either Harry MacNealy, C.E.O. and C.C.O. and/or Chuck Hoover, President. While your account will be assigned one of us as your primary portfolio manager, both of us may execute transactions in your accounts. We feel this practice increases continuity and broadens the level of expertise in managing your assets.

Since MHIM has fewer than 100 client relationships, we are able to be extremely attentive in managing your assets . At least quarterly, either Harry MacNealy, C.E.O. and C.C.O. and/ or Chuck Hoover, President will conduct a full review of every account. This review includes an analysis of asset and sector allocation, quality of individual securities, and an evaluation of potential tax consequences. Obviously, accounts are monitored much more frequently as triggered by news and earnings releases , maturity of fixed income securities, changes in bond ratings, and by communications with you.

If, for example, there is a breaking news story that we feel may impact the price of a stock, we utilize our Performance Technology software which enables us ( in seconds) to detail every client that owns that stock, when they bought it, and what they paid for it.

At least quarterly, the custodian of your assets will send you a report that lists all you holdings, their values, deposits, withdrawals, security trades, and interest/dividend income. We are dedicated to providing you with information tailored to your needs. We will send you a statement on a monthly or quarterly basis (your choice) that details the value of your holdings. At your request, we will also send written reports that show your asset allocation, sector diversification, cost basis, realized gains and losses, and performance.

**Item 14          Client Referrals and Other Compensation**

Do we pay anyone to recommend us ?

We do **NOT** pay anyone a fee to recommend our firm and never have.

**Item 15          Custody**

Who is responsible for holding your assets and how can you verify their accuracy ?

MHIM **does not** take custody of client funds or securities. You are responsible for choosing a custodian. If you do not have a preference, we will recommend some alternatives for you. Currently, our clients have assets being held at Charles Schwab, Merrill Lynch, Huntington Trust Department, and First Merit Trust Department. The custodian will mail statements directly to you at least quarterly. We also will send you statements on a monthly or quarterly basis depending upon your preference. We use software from Performance Technologies to reconcile our records with the custodian. However, it is important that you compare the statements from the custodian and from us to verify the accuracy of your accounts. If you own bonds, our statements will detail your accrued interest. Most custodian statements will not include this figure.

**Item 16          Investment Discretion**

Do we contact you before making any investment decision in your account ?

In our management agreement we give clients the option of designating what type of investment authority (discretionary or non-discretionary ) that they choose to give us. If **non-discretionary** authority is chosen, the client **must be contacted** before any investment transaction is executed. If **discretionary authority** is chosen, the client **does not have to be contacted** before an investment transaction is executed.

**Item 17          Voting Client Securities**

Do we vote proxies on your behalf ? If so, how do we make those decisions ?

Our clients have the option to vote all of their proxies themselves or to designate us to vote them. They also maintain the right to vote their proxy on any individual issue by notifying us. On March 9, 2003 the Securities and Exchange Commission adopted a ruling requiring federally registered investment advisors to outline how they approach this fiduciary responsibility. The following summarizes our policy and guidelines:

### **Accessibility**

1. If you are uncertain as to whether you have designated us to vote on your behalf please contact us. We will immediately honor whatever designation you choose.
2. We maintain records detailing how we have voted on all proxies since Jan. 1, 2003. We will provide this information upon your request. Records are maintained in our office for at least two years and in an easily accessible place for five years.

### **Elimination of potential conflicts**

3. Voting in a manner that insures the best interests of our clients has **always** been and will continue to be our guiding principle. Although we don't foresee any potential conflict of interest in determining our vote, if even the most remote appearance of a potential conflict exists, we will abstain from the vote and defer individually to our clients for their input.

Although each voting decision is based upon the unique characteristics and conditions of the companies, the following best summarizes our philosophy:

### **Corporate governance issues/ Anti-takeover provisions, poison pills, super majority provisions**

We vehemently oppose such proposals ! Such provisions are generally indicative of weak, insecure management teams that don't recognize they work for shareholders !

### **Expensing of stock options**

We feel it is imperative to have stock options expensed to more accurately reflect earnings per share.

### **Mergers**

In determining our vote we consider if the proposed combination enhances shareholder value. Does a better offer exist for the company being acquired ? Will the merged company be better able to compete in the future ? Is the combined company stronger ?

### **Board of Directors**

If we have been satisfied with the direction of the company, we typically support the slate of directors. If we don't feel the company/directors truly respect the rights of shareholders, we vote against them. We support individual directors who have the integrity and skills to make a difference and vote against any candidate with questionable integrity and competence. We believe the majority of the members of the Board should consist of outside directors. We vote against intertwined Boards due to their inherent potential conflict with the interests of shareholders.

### **Changes in capital structure**

We support actions that will improve balance sheets and provide our clients with better potential appreciation. We feel all equity infusions should include pre-emptive rights provisions, so as not to dilute the ownership of existing shareholders .

### **Compensation Plans**

Without question, executive compensation has clearly escalated beyond what anyone could consider fair and reasonable. We whole-heartedly believe pay should be tied to concrete, measurable performance objectives. Superior pay for superior performance makes sense to us. However, we take strong exception to packages that are almost entitlements. All too frequently we see plans which include excessive severance packages, deferred compensation plans, and stock options that dilute earnings and disadvantage most shareholders. Consequently, we vote against most compensation plans.

### **Social Policy Issues**

Corporations do have undeniable responsibility to conduct business in a manner that demonstrates respect for employees, shareholders, the community, and the environment. However, a growing number of proposals are being presented by special interest groups that give no consideration to the economic impact of implementation. We vote against issues that restrict management's right to manage.

Obviously, these examples do not cover all the issues that shareholders must consider these days. **However, the basic decision making criteria we use in casting all our votes is,**  
**" Is this in the best interests of our clients ? "**

### **Item 18                      Financial Information**

What prepayment of fees do we require ?  
Have we ever been the subject of a bankruptcy petition ?

As specified in our fee schedule we request the **prepayment of one quarter's fee.**

We have **never** been the subject of a bankruptcy petition.

**Part 2B of Form ADV: MacNealy Hoover Investment Management Brochure Supplement**

Harry C. C. MacNealy  
Chief Executive Officer and Chief Compliance Officer  
MacNealy Hoover Investment Management Inc.  
200 Market Ave. N. Suite 200  
Canton, Ohio 44702

Ph. 330-454-1010

Supplement date January 20, 2012

This brochure provides information about Harry C.C. MacNealy that supplements the MacNealy Hoover Investment Management Brochure. You should have received a copy of that brochure. Please contact Harry MacNealy if you did not receive the MacNealy Hoover Investment Management Brochure or if you have any questions about the contents of this supplement.

Additional information about Harry MacNealy is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Item 2 Educational Background and Business Experience**

Harry C.C. MacNealy  
Chief Executive Officer and Chief Compliance Officer  
Born 1952  
B.S. Economics, Wittenberg University 1974  
M.B.A. in Management, Akron University 1978  
Previously Senior Vice President of McDonald & Company Securities  
worked at McDonald & Co. 1989-1999  
MacNealy Hoover Investment Management, Inc. 1999-present

**Item 3 Disciplinary Information**

Harry MacNealy has never been involved in any legal or disciplinary actions brought by clients or prospective clients.

- A. Mr. MacNealy has never been involved with any investment related activity that led to a criminal or civil action in a domestic , foreign, or military court.
- B. Mr. MacNealy has never been involved with any administrative proceeding before the SEC, nor any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory agency .
- C. Mr. MacNealy has never had any proceedings brought against him by any SRO, self-regulating organization.
- D. Mr. MacNealy has never been involved in a proceeding in which a professional attainment, designation, or license was revoked or suspended because of a violation relating to personal conduct.

**Item 4 Other Business activities**

- A. Mr. MacNealy is not involved in any **other** investment-related business or occupation.
- B. Mr. MacNealy is not involved with any other business or occupation for compensation.



**Item 5          Additional Compensation**

- A. Mr. MacNealy does not receive any economic benefit for providing advisory services from anyone who is not a client.

**Item 6          Supervision**

- A. Since Mr. MacNealy is the firm's Chief Compliance Officer and Chief Executive Officer, no one is directly responsible for supervising the advice he provides to clients. However , Kellie Hill is responsible for auditing his personal transactions for compliance with the firm's policies.

**Part 2B of Form ADV: MacNealy Hoover Investment Management Supplement**

Charles H. Hoover  
President of MacNealy Hoover Investment management, Inc.  
200 Market Ave. N. Suite 200  
Canton, Ohio 44702

Ph. 330-454-1010

Supplement date January 20, 2012

This brochure provides information about Charles H. Hoover that supplements the MacNealy Hoover investment Management Brochure. You should have received a copy of that brochure. Please contact Harry MacNealy at the above number if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Charles H. Hoover is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Item 2 Educational Background and Business Experience**

Charles H. Hoover  
President of MacNealy Hoover Investment Management, Inc.  
Born 1965  
B.A. Business Economics, College of Wooster 1987  
M.B.A. Finance, University of Akron 1991  
Previously Vice President and Portfolio Manager at Key Asset Management  
worked at Key 1987-1999  
MacNealy Hoover Investment Management, Inc. 1999- present

**Item 3 Disciplinary Information**

Charles Hoover has never been involved in any legal or disciplinary actions brought by clients or prospective clients.

- A. Mr. Hoover has never been involved with any investment related activity that led to a criminal or civil action in a domestic, foreign, or military court.
- B. Mr. Hoover has not been involved with any administrative proceeding before the SEC, nor any other federal regulatory agency, any state regulated agency, or any foreign financial regulatory agency.
- C. Mr. Hoover has never had any proceedings brought against him by any SRO. self-regulating organization.
- D. Mr. Hoover has never been involved in a proceeding in which a professional attainment, designation, or license was revoked or suspended because of a violation relating to personal conduct.

**Item 4 Other Business Activity**

- A. Mr. Hoover is not involved in any **other** investment-related business or occupation.
- B. Mr. Hoover is not involved with any other business or occupation for compensation.

**Item 5            Additional Compensation**

- A. Mr. Hoover does not receive any economic benefit for providing advisory services from anyone who is not a client.

**Item 6            Supervision**

Mr. Harry C.C. MacNealy is the Chief Compliance Officer for MacNealy Hoover Investment Management , Inc. ( 330-454-1010 ) and is responsible for supervising Charles Hoover. This includes a review of all transactions, a review of monthly statements, and compliance with firm policies and securities laws. Kellie Hill reviews his personal transactions for compliance with the firm's Personal Trading Policy.