

# The Firm Brochure

---

Part 2A Form ADV

Revised

11/30/2014

## Rinehart Wealth Management Greater Trust

Rinehart Wealth Management  
521 E. Morehead St. • Suite 580 • Charlotte, NC 28202  
(704) 374-0646 • [rinehart@rinehartwealthmanagement.com](mailto:rinehart@rinehartwealthmanagement.com)

[www.rinehartwealthmanagement.com](http://www.rinehartwealthmanagement.com)

This brochure provides information about the qualifications and business practices of Rinehart Wealth Management. If you have any questions about the contents of this brochure, please contact us at (704) 374-0646, or by email at [rinehart@rinehartwealthmanagement.com](mailto:rinehart@rinehartwealthmanagement.com). 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 Rinehart Wealth Management also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number, known as a CRD number. Our firm's CRD number is 107236.

# The Firm Brochure

Part 2A Form ADV Revised 11/30/2014

## Item 2: Material Changes

Daniele Donahoe became a majority owner of the firm in July of 2014. Mary Rinehart maintains a minority ownership in the firm. Michael Elliott Van Ness became a Supervised Person in August 2014 and Marilyn Spencer is no longer a Supervised Person as of November 2014. The previous material changes made were in regards to Neal Deaton joining the firm as a supervised person in April 2014 and relates to Part 2B Form ADV. No other material changes have been made since our last annual brochure, revised in May 2014.

## Item 3: Table of Contents

|  |          |
|--|----------|
| <b>Material Changes.....</b>   | <b>2</b> |
| <b>Advisory Business .....</b>   | <b>4</b> |
| Firm Overview .....  | 4        |
| Assets Under Management.....   | 4        |
| <b>Fees and Compensation.....</b>  | <b>4</b> |
| Fee Schedule .....   | 4        |
| Custodial and Broker-Dealer Fees.....  | 5        |
| Nuveen Investment Fees .....   | 5        |
| <b>Performance-Based Fees and Side-By-Side Management.....</b>                                     | <b>5</b> |
| Pay for Performance.....   | 5        |
| <b>Types of Clients.....</b>   | <b>5</b> |
| Description .....  | 5        |
| <b>Methods of Analysis, Investment Strategies and Risk of Loss.....</b>                            | <b>6</b> |
| Getting to Know Our Clients.....   | 6        |
| Planning & Investments .....   | 6        |
| Asset Allocation and Risk .....  | 6        |
| <b>Disciplinary Information.....</b>   | <b>6</b> |
| Legal and Disciplinary .....   | 6        |
| <b>Other Financial Industry Activities and Affiliations.....</b>                                   | <b>6</b> |
| Affiliations .....   | 6        |
| <b>Code of Ethics, Participation or Interest in Client Transactions and Personal Trading .....</b> | <b>7</b> |
| Ethics Program .....   | 7        |

|  |           |
|--|-----------|
| Principles.....  | 7         |
| Standards of Business Conduct .....                      | 7         |
| Client and Personal Trading Provisions .....             | 8         |
| <b>Brokerage Practices.....</b>                          | <b>8</b>  |
| Selecting Custodians .....                               | 8         |
| National Advisors Trust Company Affiliation .....        | 9         |
| Trade Aggregation.....                                   | 9         |
| Broker-Dealers .....                                     | 9         |
| Complimentary Research Material and “Soft Dollars” ..... | 9         |
| <b>Review of Accounts.....</b>                           | <b>9</b>  |
| Portfolio and Financial Plan Reviews .....               | 9         |
| Dual Oversight .....                                     | 10        |
| Account Statements.....                                  | 10        |
| <b>Client Referrals and Compensation.....</b>            | <b>10</b> |
| Referral Programs .....                                  | 10        |
| <b>Custody.....</b>                                      | <b>10</b> |
| SEC “Custody” Definition .....                           | 10        |
| Statements .....   | 10        |
| <b>Investment Discretion.....</b>                        | <b>11</b> |
| Discretionary Authorities .....                          | 11        |
| <b>Voting Client Securities.....</b>                     | <b>11</b> |
| Proxy Voting .....                                       | 11        |
| <b>Financial Information .....</b>                       | <b>11</b> |
| Firm Financials.....                                     | 11        |
| <b>Brochure Supplement (Part 2B of Form ADV) .....</b>   | <b>12</b> |
| Professional Certifications .....                        | 13        |
| Supervised Persons.....                                  | 14        |
| Mary Rinehart, CFP® .....                                | 14        |
| Daniele Donahoe, CFA.....                                | 14        |
| Andrew Savant, CFP® .....                                | 15        |
| Sandra Carlson, CFP®, CPA, CDFA™ .....                   | 15        |
| Neal Deaton, IAR .....                                   | 15        |
| Michael Elliott Van Ness, CFA .....                      | 15        |

# The Firm Brochure

Part 2A Form ADV Revised 11/30/2014

## Item 4: Advisory Business

### Rinehart Wealth Management

Rinehart Wealth Management is an investment advisor registered with the Securities and Exchange Commission (SEC).

Our principal place of business is located in Charlotte, North Carolina. Rinehart Wealth Management began conducting business as a registered investment advisor in the state of North Carolina in 1985.

Rinehart Wealth Management provides advisory services to individuals, high net worth individuals, and charitable organizations.

### Firm Overview

Rinehart Wealth Management, a privately owned North Carolina corporation, is dedicated to comprehensive wealth management for our clients and their families. The firm's majority owner is Daniele Donahoe, who serves as the firm's President and Chief Investment Officer. The firm's minority owner is Mary Rinehart. From the beginning, the firm has had a singular focus: to provide highly customized investment management and financial planning solutions for our clients.

These solutions are delivered by a multidisciplinary team that includes a Financial Advisor and an Investment Manager. Portfolios are constructed to mirror our clients' goals and tolerance for risk. They are fully diversified using a mix of cash, fixed income and hybrid/alternative investments along with domestic and international equities. Portfolios can also be constructed in a socially responsible manner to mirror a client's values.

In conjunction with investment management, we offer comprehensive financial planning. Our areas of expertise include retirement, education savings, tax, risk management (insurance) and estate planning. We believe financial planning is an ongoing need and that it should proactively address the financial and family-related changes that occur during the lifetimes of our clients. As an extension of estate planning, we assist our clients with generational wealth transfers by working in partnership with their estate planning attorney and by leveraging our relationship with various trust companies.

### Assets Under Management

As of November 30, 2014, Rinehart Wealth Management managed approximately \$330 million across 250 individual client relationships. All \$330 million was managed on a discretionary basis and held directly by our custodians, Charles Schwab & Co., Fidelity Investments and National Advisors Trust Company.

These assets are in accounts which include taxable brokerage accounts, IRA accounts and trusts. Some assets are also held in accounts with Nuveen Investments who assist us with bond management.

---

## Item 5: Fees and Compensation

### Fee Schedule

The compensation for our services shall be calculated and paid in accordance with the following Schedules of Fees for clients, family members of our associates, legacy clients and family members of existing clients. Our fees are non-negotiable. We may amend these fees from time to time after giving our clients thirty (30) days written notice. Our management fee is based on a percentage of the market value of assets under management according to the schedule shown below:

# The Firm Brochure

## Part 2A Form ADV Revised 11/30/2014

### Standard Client

*Minimum Annual Fee \$7,500*

|  |               |
|--|---------------|
| -- On balances up to \$2,000,000               | 1% Annually   |
| -- On balances from \$2,000,000 to \$4,000,000 | .75% Annually |
| -- On balances over \$4,000,000                | .50% Annually |

### Family Members of RWM Employees

|  |               |
|--|---------------|
| -- On balances up to \$2,000,000               | .75% Annually |
| -- On balances from \$2,000,000 to \$4,000,000 | .50% Annually |
| -- On balances over \$4,000,000                | .30% Annually |

### Legacy Clients

|  |               |
|--|---------------|
| -- On balances less than \$1,000,000           | 1% Annually   |
| -- On balances from \$1,000,000 to \$1,500,000 | .75% Annually |
| -- On balances over \$1,500,000                | .50% Annually |

### Family Members of Existing Clients – Minimum Exemption

- On balances up to \$750,000 1% Annually
- On balances over \$750,000 a Wealth Management Agreement including comprehensive financial planning services must be signed. \*One-time standalone comprehensive financial plans can be offered to family members of existing clients with a signed engagement letter for \$7,500 per year.

Ongoing investment management fees are billed at the end of each calendar quarter. Inflows and outflows of assets during the calendar quarter will be prorated based on the number of days the assets were under our management. Amounts equal to or less than \$500 will be exempt from this proration. At the beginning or the end of a relationship, management fees will be prorated based on the number of days the account(s)/assets were under our management. We send a bill every quarter for our clients to review. The amount is automatically deducted from the cash balance of the clients' accounts. If necessary, small portions of investment securities may be sold to bring the cash balance to the level required for the automatic deduction of fees.

### Custodial and Broker-Dealer Fees

Our fees are in addition to any trading fees charged by a broker/dealer, the custodian or separate account managers as well as mutual fund expenses. The custodians that maintain our clients' accounts generally do not charge separate fees for custody services but are compensated by commissions or fees on trades they execute. We generally do not make a practice of using outside brokers or vendors, but on the rare occasion that a client seeks a service that our custodians cannot provide, there may be additional fees associated. Our custodians may charge a flat dollar amount as a "prime broker" or charge a "trade away" fee for each trade that Rinehart Wealth Management executes through an outside broker-dealer. These fees are in addition to the commissions or other compensation the client pays the executing broker-dealer. In order to minimize these trading costs, we have our custodians execute a majority of trades for clients' accounts. We have determined that having our current custodians execute most trades is consistent with our duty to seek "best execution" of clients' trades.

### Nuveen Investments Fee

For clients that can meet the \$250,000 account minimum, we will partner with Nuveen Investments on a case-by-case basis for management of municipal, corporate, government agency and US Treasury bonds. This separate account arrangement is monitored by the Investment Team to ensure Nuveen Investments is complying with our

# The Firm Brochure

## Part 2A Form ADV Revised 11/30/2014

firm's established parameters for bond quality and length of maturity. Nuveen Investments is a separate investment company and is in no way affiliated with Rinehart Wealth Management except to provide bonds for our clients' portfolios. Clients enter into a separate contractual arrangement with Nuveen Investments which is in addition to the Rinehart Wealth Management investment advisory/wealth management contract. Management fees charged by Nuveen Investments are separate and in addition to those charged by Rinehart Wealth Management.

---

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

#### Pay for Performance

Rinehart Wealth Management does not have performance-based account arrangements. Not using performance incentives allows us to give more unbiased advice: we do not favor one client account over another, nor do we assume more risk than a client wishes to take.

---

### Item 7: Types of Clients

#### Description

Rinehart Wealth Management provides advisory services to the following types of clients:

- Individuals (other than high net worth individuals)
- High Net Worth Individuals
- Charitable Organizations

We do not currently provide services to pension funds, nor do we currently administer any 401(k) plans. We partner with various trust companies to offer trust administration services to individuals. Our firm does not have any asset level minimums for opening or maintaining an account.

---

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

#### Getting to Know Our Clients

Rinehart Wealth Management gets to know our clients and their tolerance for risk before formulating investment advice. We begin this process by asking clients to complete a risk tolerance questionnaire and a life goals questionnaire. The risk tolerance questionnaire helps us evaluate our clients' knowledge of investments and how market risk affects the value of investments, as well as how risk can lead to losses. The life goals questionnaire helps us to understand our clients' views and beliefs about money.

These questionnaires are reviewed with the client by their assigned Financial Advisor and Investment Manager prior to developing an investment strategy or making investment recommendations. This discussion provides everyone involved with the opportunity to ask questions and address them thoroughly. This dialogue around risk, the markets and the possibility of loss leads to the Investment Manager's developing an asset allocation strategy he or she feels accurately mirrors the client's tolerance for risk.

#### Planning & Investments

Although a client's risk tolerance is the primary driver in developing the appropriate asset allocation and investment strategy, we also try to validate the investment strategy through the financial planning we do for our clients. For example, the retirement planning illustrations that we provide make assumptions around portfolio returns. These returns and the subsequent portfolio growth shown in the retirement planning illustrations often demonstrate to our clients that higher rates of return and the higher associated risk are not always necessary to achieve their longer-term

# The Firm Brochure

## Part 2A Form ADV Revised 11/30/2014

retirement goals and the reverse of this is also true. Integrating their investment return forecast into their financial planning helps our clients better understand how over time, a portfolio can grow sufficiently with less risk and less potential for loss.

### **Asset Allocation and Risk**

Rinehart Wealth Management employs an investment strategy based on having a diversified investment portfolio using five primary asset classes: cash, fixed income (bonds), hybrid or alternative investments, domestic equities and international equities. Within each asset class, we diversify further by considering factors such as, but not limited to, sector, size of the company and geographic location. This focus on fully diversifying our clients' portfolios is intended to mitigate risk by investing in numerous areas of the market and allows us to avoid trying to "time" market swings. We believe this strategy is effective for avoiding significant or unusual risks and dampening the corresponding volatility and potential for loss. We do not engage in frequent trading but prefer to buy securities we believe represent a good value and have potential for appreciation over several months or years.

All investment programs have certain risks. Our investment approach of using multiple asset classes combined with other factors such as sectors, company size and geographic location diminishes the risk associated with primarily recommending a particular type of security. However, as with all investments, clients face investment risks including the following: loss of principal risk, interest-rate risk, market risk, inflation risk, currency risk and reinvestment risk.

---

## **Item 9: Disciplinary Information**

### **Legal and Disciplinary**

Neither Rinehart Wealth Management nor any of its owners or associates has ever been the subject of any legal or disciplinary events material to our business.

---

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

### **Affiliations**

Neither Rinehart Wealth Management nor any of its owners or associates is actively engaged in any outside investment-related business or occupation. We do, however, have a shareholder interest in National Advisors Trust Company (see Brokerage Practices).

---

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

### **Ethics Program**

Rinehart Wealth Management maintains and monitors ethical standards to ensure transparency and fairness in our business practices. These standards are assessed regularly to ensure they address changing processes and procedures associated with managing our clients' financial planning and investment needs. Our ethical principles, business standards and procedures are presented to our associates annually and on an as-needed basis to address staffing and/or procedural changes that may occur during the course of a year. Failure on the part of our associates to adhere to these principles and business standards will result in dismissal from our firm. We will provide a copy of our code of ethics to any client or prospective client upon request.



# The Firm Brochure

Part 2A Form ADV Revised 11/30/2014

## Principles

*Principle of Fiduciary Duty* – Associates will act in utmost good faith in a manner they reasonably believe to be in the best interest of the client.

*Principle of Integrity* – Associates will place the interests of clients first and will not take inappropriate advantage of their positions or the knowledge derived from having access to nonpublic information about our clients. All personal securities transactions will be conducted in a manner consistent with our firm's policy to avoid any conflict of interest or any abuse of an associate's position of trust and responsibility.

*Principle of Confidentiality* – Information concerning the identity of security holdings and financial circumstances of each client will remain confidential. This information will be provided to associates on a "need to know" basis or as authorized by our clients.

*Principle of Objectivity* – Associates will exercise objectivity in all financial planning and investment management decisions. This includes disclosing anything that may exist in our financial business, property or even personal interests and relationships that may impair our ability to offer objective advice, to make objective recommendations or to provide services objectively.

*Principle of Professionalism* – Associates will engage in fair and honorable business practices. Associates will behave with dignity and courtesy when dealing with clients.

## Standards of Business Conduct

*Compliance with Laws and Regulations* – Our associates must comply with applicable federal and state securities laws. Our associates are not permitted to defraud or mislead a client in any manner, including making a statement that omits material facts. Our associates may not engage in any act, practice or course of conduct which operates or would operate as a fraud or deceit upon a client. Our associates may not engage in any manipulative practice with respect to a client or engage in any manipulative practice with respect to securities, including price manipulation.

*Conflicts of Interest* – We have an affirmative duty of care, loyalty, honesty and good faith to act in the best interests of our clients. Compliance with this duty is achieved by avoiding conflicts of interest and by fully disclosing all material facts concerning any conflict of interest that arises with respect to any client.

*Conflicts Among Clients Interests* – Conflicts of interest may arise when the firm or its associates has reason to favor the interest of the firm or the interests of one client over another client. The Code of Ethics prohibits inappropriate favoritism of this type, and the existence of such favoritism would constitute a breach of fiduciary duty.

*Marketing and Promotional Materials* – Our associates must submit materials prepared for client seminars, outside marketing efforts and newsletters to the Chief Compliance Officer prior to their use.

*Confidentiality* – All information concerning the identity of security holdings and the financial circumstances of our clients is confidential. Our associates are prohibited to misuse client information. Procedures and physical and electronic safeguards are in place to provide reasonable protection and to limit access about advisors' securities recommendations and clients' securities holdings and transactions. Procedures are also in place to provide instruction to our associates if they come in contact with material nonpublic information, which begins with immediately notifying the Chief Compliance Officer upon receipt of material nonpublic information.



# The Firm Brochure

Part 2A Form ADV Revised 11/30/2014

## Client and Personal Trading Provisions

*Competing With Client Trades* – Because our associates sometimes buy and sell the same securities in their personal accounts that we recommend for clients, it is our policy to perform client trades before associate trades. We have monitoring in place to ensure compliance with this policy.

*Insider Trading* – All associates must adhere to our policies and procedures regarding insider trading. Associates are prohibited from trading, either personally or on behalf of others, while in possession of material nonpublic information. All associates are prohibited from communicating material nonpublic information to others.

*Initial Public Offerings (IPOs) & Limited or Private Offerings* – Participation in initial, limited or private offerings is rare but is sometimes made available through our custodians. Our associates are required to discuss with the Chief Investment Officer and Chief Compliance Officer any intent to participate in transactions of this nature, whether personally or on behalf of a client. The effort to “pre-clear” provides an opportunity to identify any conflicts of interest and to determine if it is in the best interest of the clients.

*Short Term Trading* – We generally discourage our associates’ engaging in short-term trading activities. Any desire to do so by an associate is discussed on a case-by-case basis; in these discussions, our goal is to understand why an associate wishes to perform short term trades and to reinforce the fact that both the use of nonpublic information and the act of placing themselves in a more favorable position than a client are prohibited and will result in termination.

---

## Item 12: Brokerage Practices

### Selecting Custodians

Rinehart Wealth Management does not maintain custody of the assets that we manage or advise on behalf of our clients (see Custody section for further information). Clients’ assets must be maintained in an account at a “qualified custodian,” which is generally a broker, a bank or a trust company. We have used Charles Schwab & Co., Fidelity Investments and National Advisors Trust Company (NATC) for several years to serve as custodians for our clients. We are independently owned and operated and are not affiliated with Schwab or Fidelity. We do have an ownership interest in NATC (see National Advisors Trust Company Affiliation section, below). Schwab, Fidelity and NATC will hold clients’ assets in a brokerage account and will buy and sell securities only when Rinehart Wealth Management or the client instructs them to.

We choose to work with Schwab, Fidelity and National Advisors Trust versus other custodians because of the benefits they provide to our clients. We weigh such criteria as the custodian’s reputation, financial strength, past exhibited service levels, the breadth of available investment products and the ability to efficiently execute trades in client accounts. We also pay close attention to the expenses paid by our clients to the custodians in return for general account service. We periodically evaluate our custodians against others to compare costs and benefits and to ensure our clients are receiving service levels commensurate with the fees charged by their custodian. We will recommend to a client one of the three custodians based on their individual circumstances, but each client will ultimately decide which custodian they prefer. As part of our assessment, we consider whether the client already has a relationship with one of the custodians and we often elect to continue that existing relationship if the client is happy with the service they have been receiving. Clients will open their account(s) with the custodian by filling out the applicable paperwork that we prepare for their review and signature. If a client does not wish to place their assets with one of our custodians, then we cannot manage those assets because we do not have arrangements with any other custodians to provide trading and service.

# The Firm Brochure

Part 2A Form ADV Revised 11/30/2014

## **National Advisors Trust Company Affiliation**

Mary Rinehart is a shareholder of National Advisors Holdings, Inc. (NAH), a Delaware corporation organized in August of 1998. She holds a minority interest, in aggregate, of the stock of NAH. In 2001, NAH formed a federal trust company called National Advisors Trust Company (NATC). NATC is a privately-owned company started by and for Registered Independent Advisors so that shareholding advisors could offer trust administration services to their clients at competitive prices. NAH and NATC are chartered and regulated by the Office of the Comptroller of the Currency, a bureau of the U.S. Treasury Department. NATC provides trust administration and other custodial services to clients of investment advisory firms, such as ourselves, across the United States. Rinehart Wealth Management refers clients who are in need of trust services to NATC. We do not receive direct compensation for these referrals.

## **Trade Aggregation**

As a general practice, Rinehart Wealth Management does not aggregate trades for our clients. Trading is done on an account-by-account basis in the context of the client's rebalancing and individual portfolio needs. From time to time we will sell an investment in aggregate if we believe there is a risk of significant loss. We do not buy investments in aggregate but rather try to buy investments within price ranges we feel represent a good value for our clients' portfolios. Because of our relationships with Charles Schwab, Fidelity Investments and National Advisors Trust Company, we believe our clients receive very favorable pricing for their trades. Because of this pricing, we do not believe any cost reduction associated with aggregate trading offsets the benefit of trading on an account-by-account basis.

## **Broker-Dealers**

Due to the favorable trading prices with our custodians we do not typically make use of broker-dealers. On the rare occasion that a client requires a service that we cannot provide with our normal custodians, we will permit a broker-dealer relationship, but because of the fees associated with such a relationship, we discourage the practice for almost all circumstances (see Fees & Compensation for further information on these costs).

## **Complimentary Research Materials and "Soft Dollars"**

Rinehart Wealth Management receives complimentary economic data, electronic market quotations, performance measurement services and research information from Charles Schwab & Co., Inc., Fidelity Investments and National Advisors Trust Company. These benefits are standard in a relationship with these custodians and are not in return for client recommendations or transactions. Because we rely primarily on research and information providers other than Schwab, Fidelity and National Advisors Trust for investment research, the complimentary data they provide does not have a significant bearing on our decision about which custodian we recommend for a client to use.

Some investment managers receive "soft dollars," which are incentives that do not come in the form of direct compensation. An example of soft dollars received by an investment manager might be free participation at an industry conference sponsored by the custodian. Rinehart Wealth Management does not accept such incentives from our custodians.

# The Firm Brochure

Part 2A Form ADV Revised 11/30/2014

## Item 13: Review of Accounts

### Portfolio and Financial Plan Reviews

The investment team reviews portfolios monthly, quarterly and/or annually. The frequency of this portfolio review is determined by such factors as client requests, how many stocks or mutual funds a portfolio holds, variances to target allocations defined by a client's risk profile, investment holdings that may have attained certain levels of gains or losses or investment holdings that may hold other concerns. Other factors that motivate a portfolio review include personal changes in clients' circumstances, concerns regarding investment suitability or unanticipated cash needs.

Individual investments such as stocks, mutual funds, exchange traded funds (ETFs) and bonds are monitored continually by the firm's investment team. This team is made up of four individuals: Mary Rinehart, Daniele Donahoe, Elliott Van Ness and Neal Deaton. Research on investments is delegated to individuals on the investment team. Findings are discussed by the entire investment team with the final decision-making responsibilities falling to Daniele Donahoe, the firm's Chief Investment Officer.

Financial advisors routinely monitor their assigned clients' portfolios on a quarterly basis and financial plans on an annual basis. Additional reviews by the financial advisors are often motivated by a specific client request or action such as an unanticipated deposit or withdrawal. Changes in personal circumstances, such as the loss of a spouse or a change in employment status might also trigger a review.

### Dual Oversight

Specific portfolio changes are made primarily by the investment team and communicated to the client by the financial advisors. This dual oversight by the investment team (making the recommendation) and by the financial advisors (reviewing and communicating the recommendation) helps ensure investment changes are consistent with client needs and expectations. Investment recommendations are executed through our independent custodians by a dedicated trader and then independently confirmed by the financial advisor for accuracy.

### Account Statements

Rinehart Wealth Management prepares and mails quarterly statements to our clients. This quarterly statement shows each account a client has and the value for all the accounts in aggregate as of the end of a specific quarter; it does not show transaction activity. Transaction activity is outlined in the monthly statements that the client receives directly from their custodian (see Statements below for more information about custodian statements).

---

## Item 14: Client Referrals and Compensation

### Referral Programs

Rinehart Wealth Management does not participate in any referral programs. We will occasionally refer a client to a third-party individual or firm who has particular knowledge of an area, but we receive no compensation for such referrals. We are grateful if and when someone refers a client to our firm, but we do not offer any compensation for such referrals.

---

## Item 15: Custody

### SEC "Custody" Definition

According to new SEC regulations, investment advisers are deemed to have "custody" of client funds if certain conditions are met. Rinehart Wealth Management may be technically considered to have "indirect custody" of accounts due to the fact that we are authorized to deduct funds from client accounts for management fee payment (see: Fees & Compensation).

# The Firm Brochure

Part 2A Form ADV Revised 11/30/2014

## Statements

Our clients receive monthly statements directly from our independent custodians, Charles Schwab, Fidelity Investments and/or National Advisors Trust Company, for each of their accounts. All transaction activity is reflected in these independent, third-party monthly statements, and clients are encouraged to review these statements carefully.

In addition to these monthly independent custodian statements, Rinehart Wealth Management prepares and mails quarterly statements to our clients. This quarterly statement shows each account a client has and the value for all the accounts in aggregate as of the end of a specific quarter; it does not show transaction activity. This quarterly statement should be reconciled by the clients against the independent custodian quarter-end statements (March, June, September and December) to ensure the ending values are equal.

---

## Item 16: Investment Discretion

### Discretionary Authorities

Rinehart Wealth Management typically accepts discretionary authority to manage securities accounts on behalf of our clients. Clients enter into this agreement by signing a Limited Power of Attorney document or account application furnished by the third-party custodian that grants certain defined permissions to our firm. These permissions typically include authorization to conduct trades, authorization to deduct fee payments and authorization to request copies of statements. These permissions might include authorization to make disbursements to banks, broker-dealers, investment companies or other financial institutions as well as authorization to make disbursements to the client. These permissions do not typically include the ability to transfer money into the account or out of the account to any entity not described above. A client may revoke these authorizations at any time by contacting their custodian.

---

## Item 17: Voting Client Securities

### Proxy Voting

Rinehart Wealth Management, unless instructed otherwise by the client, directs our custodians (Schwab, Fidelity and National Advisors Trust Company) to forward domestic company proxy material to Glass Lewis & Co., LLC, a third-party proxy voting service. Proxy materials are reviewed and voted based on Glass Lewis & Co., LLC recommendations and based on our fiduciary responsibility to our clients. We vote proxies for international companies and mutual funds and do not engage Glass Lewis & Co., LLC for those holdings. All voting is done electronically. We generally vote in a manner consistent with Board recommendations. However, because we vote proxies in a manner we believe to be in the best interest of our clients, we do vote against the advice of the company management on occasion.

If a client so wishes, they can choose to do their own proxy voting. All clients receive an annual disclosure reminding them of the option to vote for themselves as well as a summary of our proxy voting policies. Proxy records are maintained for a period of at least five years, and clients may request a copy of these policies and procedures, which may be updated periodically, or a record of how proxies were voted, at any time.

---

## Item 18: Financial Information

### Firm Financials

Pursuant to the SEC's guidelines, we are not required to furnish a balance sheet because we do not require prepayment of more than \$1200 per client six months or more in advance. We have no financial conditions that we believe are reasonably likely to impair our ability to meet our contractual commitments.

# Brochure Supplement Part 2B Form ADV

Revised

11/30/2014

Rinehart Wealth Management  
521 E. Morehead St. • Suite 580 • Charlotte, NC 28202  
(704) 374-0646 • [rinehart@rinehartwealthmanagement.com](mailto:rinehart@rinehartwealthmanagement.com)  
[www.rinehartwealthmanagement.com](http://www.rinehartwealthmanagement.com)

## Supervised Persons

Mary Rinehart, Daniele Donahoe, Andrew Savant, Sandra Carlson, Neal Deaton and Michael Elliott Van Ness

This brochure supplement provides information about Mary C. Rinehart, Daniele M. Donahoe, Andrew Savant, Sandra Carlson, Neal Deaton, and Michael Elliott Van Ness that supplements the Rinehart Wealth Management brochure (Form ADV Part 2A). You should have received a copy of that brochure. Please contact Rinehart Wealth Management if you did not receive the firm's brochure or if you have any questions about the content of this supplement.

Additional information about our advisory associates is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number, known as a CRD number. Our firm's CRD number is 107236.

## Professional Certifications

Employees have earned certifications and credentials that we are required to explain in further detail.

---

### CERTIFIED FINANCIAL PLANNER™ (CFP®)

CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time, or the equivalent 6,000 hours, of financial planning-related experience that falls within one or more of the six primary elements of the [personal financial planning process](#) or by completing at least two years full-time, or the equivalent 4,000 hours, of "Apprenticeship Experience" focused exclusively on personal delivery of all the personal financial planning process to a client, with direct supervision by a CFP® professional; and
- Ethics – Agree to be bound by CFP Board’s Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

---

### CHARTERED FINANCIAL ANALYST (CFA®)

CFA®, Chartered Financial Analyst®, and the CFA Logo certification mark are trademarks owned by CFA Institute.

Holders of the Chartered Financial Analyst® designation are securities analysts, money managers and investment advisers who have completed the CFA program, a graduate-level, self-study curriculum and examination program for investment professionals that covers a broad range of investment topics.

To earn a CFA charter, you must have four years of qualified investment work experience, become a member of CFA Institute, pledge to adhere to the CFA Institute Code of Ethics and Standards of Professional Conduct on an annual basis, apply for membership to a local CFA member society, and complete the CFA Program.

---



The CFA Program is organized into three levels, each culminating in a six-hour exam. Completing the Program takes most candidates between two and five years but you can take as long as you need to complete the program. The Program reflects a broad Candidate Body of Knowledge™ (CBOK) developed and continuously updated by active practitioners to ensure that charter holders possess knowledge grounded in the real world of today's global investment industry.

## Supervised Persons

---

### **Mary C. Rinehart, CFP®** – Minority Owner, Chief Executive Officer

Mary, born in 1939, started First Personal Financial Services Inc. in 1985 and later changed the name to Rinehart & Associates, now Rinehart Wealth Management. Since 1993, she has served as owner, chairperson, and chief investment officer of the firm. She received her undergraduate degree in European History from Sweet Briar College in 1961 and took additional business courses at Queens University in the 1970s. Since 1988 she has been a Certified Financial Planner™ Certificant.

*Disciplinary Information:* None

*Other Business Activities:* None

*Additional Compensation:* None

*Supervision:* Mary's investment-related activities are supervised by Daniele Donahoe, President. Further information about our supervision can be found in the Review of Accounts section of our Form ADV, Part 2A.

---

### **Daniele Donahoe, CFA** – Majority Owner, President, Chief Investment Officer

Daniele has been with Rinehart Wealth Management since May 2010. Previously, she worked for Columbia Management Group, where as a Senior Portfolio Manager she co-managed the Columbia Small Cap Growth II fund. Prior to Columbia Management, Daniele served as an Associate Analyst on an *Institutional Investor Magazine* Ranked Equity Research Team following the Enterprise Software Industry at Salomon Smith Barney (Citigroup) in New York. She has also served as an associate at Thomas Weisel Partners in San Francisco, CA and J.C. Bradford in Nashville, TN. Throughout her career, Daniele has focused on equity research across a broad range of industries ranging from multi-billion dollar corporations to small and micro capitalization equities, and she has co-authored industry publications such as *B2B eCommerce: A Vertical and Horizontal Perspective* and *E2E Commerce: How the Internet Redefines Enterprise Software*. Born in 1975, Daniele is a 1997 graduate of the Kenan-Flagler Business School at the University of North Carolina at Chapel Hill.

*Disciplinary Information:* None

*Other Business Activities:* None

*Additional Compensation:* None

*Supervision:* Daniele's activities are supervised by Mary Rinehart, Minority Owner and CEO. Further information about our supervision can be found in the Review of Accounts section of our Form ADV, Part 2A.

---

### **Andrew Savant, CFP®** – Wealth Advisor

Andrew joined Rinehart Wealth Management as a Wealth Advisor in 2012. Andrew is a CERTIFIED FINANCIAL PLANNER™ Practitioner. He holds his Series 65 license and is an Investment Advisor Representative. He graduated cum laude from Clemson University in 2007 with a Bachelor of Science in Financial Management and minor in Accounting. During his time at Clemson, Andrew was an officer in the Beta Alpha Psi accounting fraternity and organized the yearly service project to prepare tax returns for local nonprofit organizations in the community. He was also a supplemental instructor for the accounting department for 2 years.

*Disciplinary Information:* None

*Other Business Activities:* None

*Additional Compensation:* None

*Supervision:* Andrew's activities are supervised by Daniele Donahoe, President. Further information about our supervision can be found in the Review of Accounts section of our Form ADV, Part 2A.

---



---

**Sandra Carlson, CFP®, CPA, CDEA™** – Wealth Advisor and Chief Compliance Officer

Sandy Carlson joined Rinehart Wealth Management in August 2013 as a Wealth Advisor. Sandy is a CERTIFIED FINANCIAL PLANNER™ Practitioner. She brings over eighteen years of wealth management experience with her that includes income taxation, retirement planning, insurance, trusts and banking. She is a graduate of Florida State University receiving her Bachelor of Science in Finance. She holds her Series 65 license and is a Registered Investment Advisor Representative. In addition, she holds the Qualified 401(K) Administrator (QKA) designation by the American Society of Pension Professionals & Actuaries and is a Certified Divorce Financial Analyst®.

*Disciplinary Information:* None

*Other Business Activities:* None

*Additional Compensation:* None

*Supervision:* Sandra's activities are supervised by Daniele Donahoe, President. Further information about our supervision can be found in the Review of Accounts section of our Form ADV, Part 2A.

---

**Neal Deaton, Investment Advisor Representative** – Investments and Operations Manager

Neal Deaton joined Rinehart Wealth Management in April 2014 as the Investment and Operations Manager. He holds the Series 65 license and is an Investment Advisor Representative. Neal earned a Bachelor of Arts degree in Economics from the University of North Carolina at Chapel Hill and a Master of Business Administration degree with a concentration in Finance from the Mason School of Business at The College of William and Mary. Prior to Rinehart, Neal worked for Parsec Financial Management as a Portfolio Manager where he managed and invested the assets of high-net-worth clients.

*Disciplinary Information:* None

*Other Business Activities:* None

*Additional Compensation:* None

*Supervision:* Neal's activities are supervised by Daniele Donahoe, President. Further information about our supervision can be found in the Review of Accounts section of our Form ADV, Part 2A.

---

**Michael Elliott Van Ness, CFA** – Director of Research and Portfolio Manager

Elliott joined Rinehart Wealth Management in March 2010 and currently serves as Director of Research and Portfolio Manager. In his role as the firm's Director of Research, Elliott orchestrates the firm's in-house proprietary investment research and analysis. In conjunction with the Chief Investment Officer, Elliott developed the firm's first Quarterly Economic Overview, a fifty-minute presentation broadcasted online and presented to professionals and small businesses for Continuing Education ("CE") credit. In addition to analyzing global economic trends, Elliott performs in-depth equity market research, fundamental equity analysis, and third-party manager reviews utilizing robust financial market analytics software. He helped to implement and design the research and portfolio manager due diligence templates that serve as the basis and framework for Rinehart's proprietary research process. Elliott leads and monitors the strategic implementation of investment technologies that improve the efficiency and efficacy of the firm, such as the recent firm-wide implementation of an enhanced wealth management software suite – Envestnet Tamarac Advisor Xi Suite. He oversees and directs investment activities, working closely with the Chief Compliance Officer to monitor trade execution and compliance requirements across the entire firm. In his role as a Portfolio Manager, Elliott works with the Financial Advisory Team on guiding client investment strategies and conducting systematic portfolio reviews and performance evaluations. Elliott is a graduate of Davidson College where he earned a Bachelor of Arts in French and a minor in Economics.

*Disciplinary Information:* None

*Other Business Activities:* None

*Additional Compensation:* None

*Supervision:* Elliott's activities are supervised by Daniele Donahoe, President. Further information about our supervision can be found in the Review of Accounts section of our Form ADV, Part 2A.