

Item 1 Cover page of MacNealy Hoover Investment Management Brochure

ADV Part 2A

MacNealy Hoover Investment Management, Inc.
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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 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**.

Item 2 Material Changes

There have been no material changes since our last filing in March of 2017.

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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.

Client Obligations. In performing our services, MHIM shall not be required to verify any information received from the client or from the client's other professionals, and is expressly authorized to rely thereon. Moreover, each client is advised that it remains his/her responsibility to promptly notify us if there is ever any change in his/her financial situation or investment objectives for the purpose of reviewing, evaluating, or revising our previous recommendations and/or services.

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

Common stocks

Preferred stocks

ADR's (American Depositary 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.

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, 2017 assets under management by MHIM as follows:

	87 discretionary account relationships	\$ 253,851,035
	1 non-discretionary relationship	\$ 1,370,540
Total	88 account relationships	\$ 255,221,575

A relationship may include multiple accounts.

Part 4 Miscellaneous

Limitations of Services. MHIM does not hold itself out as providing financial planning services. To the extent specifically requested by a client, MHIM may provide limited consulting services regarding non-investment related matters, such as estate planning, tax planning, insurance , etc. However, no such advice should be considered as comprehensive financial planning or consulting services. We do not serve as an attorney, accountant, or insurance agency, and no portion of our services should be construed as same. Accordingly, we do not prepare estate planning documents, tax returns, or sell insurance products. To the extent requested by a client, we may recommend the services of other professionals for certain non-investment implementation purpose. The client is under no obligation to engage the services of any recommended professional. The client retains absolute discretion over all such decisions and is free to accept or reject any recommendation that we make. If the client engages any unaffiliated recommended profession, and a dispute arises thereafter relative to such engagement, the client agrees to seek recourse exclusively from and against the engaged professional.

Retirement Rollovers- Potential for Conflict of Interest: A client or prospective client leaving an employer typically has four options regarding an existing retirement plan (and may engage in a combination of these options): 1. leave the money in the former employer's plan, if permitted, 2. roll over the assets to the new employer's plan, if one is available and rollovers are permitted,

3. roll over to an Individual Retirement Account, or 4. cash out the account value (which could result in adverse tax consequences depending upon the client's age) If MHIM recommends that a client rollover their retirement plan assets into an account managed by MHIM, such a recommendation creates a conflict of interest if MHIM will earn an advisory fee on the rolled over assets. When acting in such capacity, MHIM serves as a fiduciary under the Employee Retirement Income Security Act (ERISA). No client is under any obligation to rollover retirement plan assets to an account managed by MHIM. MHIM's Chief Compliance Officer remains available to address any questions that a client or prospective client may have regarding the potential for conflict of interest presented by such rollover recommendation.

Use of Mutual Funds: Most mutual funds are available directly to the public. Thus, a prospective client can obtain many of the mutual funds that may be recommended and/or utilized by MHIM independent of engaging MHIM as an investment advisor. However, if prospective client determines to do so, he/she will not receive MHIM's initial and ongoing investment advisory services. **Separate fees:** All mutual funds (and exchange traded funds) impose fees at the fund level (e.g. management fees and other fund expenses).

All mutual fund fees are separate from, and in addition to, MHIM's wealth management fee as described at Item 5 below. MHIM's Chief Compliance Officer, Harry MacNealy, remains available to address any questions that a client or prospective client may have regarding the above.

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. MHIM, in its sole discretion, may charge a lesser investment management fee and/or reduce or waive its aggregate portfolio minimum based upon certain criteria (i.e. anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, negotiations with client, etc.) As a result of the above, similarly situated clients could pay different fees. In addition, similar advisory services may be available from other investment advisers for similar or lower fees. 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.

TradeAway/Prime Broker Fees. Relative to its discretionary investment management services, when beneficial to the client, individual equity and/or fixed income transactions may be effected through broker-dealers other than the account custodian, in which event, the client generally will incur both the fee (commission, mark-up/mark-down) charged by the executing broker-dealer and a separate "tradeaway" and/or prime broker fee charged by the account custodian.

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, 2017, MHIM had 88 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 three profit-sharing retirement plans, two non-high net worth account relationships, and one nonprofit organization's endowment. 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, 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 vitally important for us to get to know our clients. We don't utilize written questionnaires. We believe that in the course of our personal meetings, we can get a much better feel for what you want us to accomplish.

Obviously, we try to ascertain your return objectives, risk tolerance, income and liquidity needs, and time horizons. But it is also important to insure we are attuned to your communication preferences. How often do you want us to talk with you? What kinds of information do you want us to provide ? Do you want this information delivered in paper form or delivered electronically ? etc.

After we have reviewed this information, we evaluate if we believe MacNealy Hoover Investment Management will be a good fit for you. If we don't believe we can achieve your goals, 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. (The stock and sector more grow to a higher percentage through appreciation) 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 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.

Investment Risk. Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by MHIM) will be profitable or equal any specific performance level.

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 accomplishes anything. Consequently, we geared our trading policy to preserve integrity as follows:

MHIM personnel must not never **intentionally** execute personal buy or sell transactions in a manner that would disadvantage clients. There may be extremely rare circumstances when personal transactions fill at a better price than a client's execution. This could happen if a client called and requested a DIRECTED order for their account after a MHIM personnel trade had been executed or that an existing open GTC order filled at a better level.

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 client** transactions in those timeframes for compliance with our policy and to insure clients' interest are coming first !

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.

MHIM personnel ARE permitted to invest in secondary offerings of companies we own and are permitted to invest in a new capital structure offering (for example, Convertible Preferred shares) if ownership of the common entitles the offering being made to existing shareholders first.

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.

Every allocation is reviewed and retained by Kellie Hill to document that no client is receiving preferential or inferior treatment !

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

In the event that the client requests that we recommend a broker-dealer/custodian for execution and/or custodial services, we generally recommend that the investment accounts be maintained at Charles Schwab & Co., Inc. Prior to engaging us to provide investment management services, the client will be required to enter into a formal Investment Agreement with us setting forth the terms and conditions under which we shall manage the client's assets, and a separate custodial/clearing agreement with each designated broker-dealer/custodian.

Factors that we consider in recommending Schwab (or any other broker-dealer/custodian to clients) include historical relationship, financial strength, reputation, execution capabilities, pricing, research, and service. Although the commissions and/or transaction fees paid by our clients shall comply with our duty to obtain best execution, a client may pay a transaction fee that is higher than another qualified broker-dealer might charge to effect the same transaction. This is where we

determine, in good faith, that the transaction fee is reasonable. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into full consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although we seek competitive rates, it may necessarily obtain the lowest possible commission rates for client account transactions. The brokerage commissions or transaction fees charged by the designated broker-dealer/custodian are exclusive of, and in addition to, our advisory fee.

Non-Soft Dollar Research and Additional Benefits. Although not a material consideration when determining whether to recommend that a client utilize the services of a particular broker-dealer/custodian, we may receive from Schwab (or another broker-dealer/custodian, investment manager, platform or fund sponsor, or vendor) without cost (and/or at a discount) support services and/or products, certain of which assist us to better monitor and service client accounts maintained at such institutions. Included within the support services that may be obtained by us may be investment related research, pricing information and market data, software and other technology that provide access to client account data, compliance and/or practice management-related publications, discounted or gratis consulting services, discounted and/or attendance at conferences, meetings, and other educational and/or social events, marketing support-including client events, computer hardware and/or software and/or other products used by us in furtherance of its investment advisory business operations.

As indicated above, certain of the support services and/or product that may be received may assist us in managing and administering client accounts. Others do not directly provide such assistance, but rather assist us to manage and further develop its business enterprise.

Our clients do not pay more for investment transactions effected and/or assets maintained at Schwab as a result of this arrangement. There is no corresponding commitment made by us to Schwab or any other entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as a result of the above arrangement.

Our Chief Compliance Officer, Harry MacNealy, remains available to address any questions that a client or prospective client may have regarding the above arrangement and any corresponding perceived conflict of interest such arrangements may create.

Directed Brokerage. (When a client requires that account transaction be effected through a specific broker-dealer) In such client directed arrangements, the client will negotiate terms and arrangements for their account with that broker-dealer, and we will not seek better execution services or prices from other broker-dealers or be able to "batch" the client's transactions for execution through other broker-dealers with orders for other accounts managed by us. As a result, a client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case. In the event that the client directs us to effect securities transactions for the client's accounts through a specific broker-dealer, the client correspondingly acknowledges that such direction may cause the accounts to incur higher commissions or transaction costs than the accounts would otherwise incur had the

client determined to effect account transactions through alternative clearing arrangements that we recommend. Higher transaction costs adversely impact account performance. Please also note: Transaction for directed accounts will generally be executed following the execution of portfolio transactions for non-directed accounts.

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 your 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.

As referenced above, we may receive from Schwab, without cost (and/or at a discount), support services and/or products. Our clients do not pay more for investment transactions effected and/or assets maintained at Schwab as a result of this arrangement. There is no corresponding commitment made by us to Schwab or any other entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as a result of the above arrangements. Our Chief Compliance Officer, Harry MacNealy, remains available to address any questions that a client or prospective client may have regarding the above arrangement and any corresponding perceived conflict of interest such arrangements may create.

Item 15 Custody

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

MHIM **does not** take physical custody of client funds or securities. (Since we are able to deduct our mgt. fees from your account, technically we may be deemed to have custody) You will always receive a billing statement and the amount withdrawn will show on the statement from your custodian) You are responsible for choosing a custodian. If you do not have a preference, we will recommend some alternatives for you. Currently, the majority of our clients' assets are custodied at Charles Schwab. In the past, Merrill Lynch, Huntington Trust Department, and First Merit Trust Department have served as custodian for some of our clients. When this situation exists, 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.

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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.

Our Chief Compliance Officer, Harry MacNealy, remains available to address any questions regarding this Part 2A.

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 February 21, 2018

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.

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.

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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 February 21, 2018

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.

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.