

Part 2A of Form ADV: Firm Brochure

**Reinking Consulting Inc.
(DBA: *Reinking Financial Consulting*)**

18455 Pathfinder Drive
Eden Prairie, Minnesota 55347

Telephone: 952-949-2166
Email: Ricardo@ReinkingFinancialConsulting.com
Web Address: <http://www.ReinkingFinancialConsulting.com>

04/07/2024

This brochure provides information about the qualifications and business practices of ***Reinking Consulting Inc.***, which does business under the name: ***“Reinking Financial Consulting”***. If you have any questions about the contents of this brochure, please contact us at **952 949-2166** or Ricardo@ReinkingFinancialConsulting.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 ***Reinking Financial Consulting*** also is available on the SEC’s website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a **CRD** number.

Firm's CRD number: **128457**.

Item 2 Material Changes

The SEC adopted "*Amendments to Form ADV*" in 2010. This firm brochure, dated **04/07/2024**, is our new disclosure document prepared according to the SEC's most recent requirements and rules. This document is in narrative form, designed to be easy to read and understand. It also includes information that we were not previously required to disclose.

After our initial filing of this brochure, it will henceforth be used to provide our clients with a summary of new and/or updated information. We will inform you of the revision(s) based on the nature of the updated information.

Consistent with the new rules, we will ensure that you receive a summary of any material changes to this and subsequent brochures within 120 days of the close of our business' fiscal year. Furthermore, we will provide you with other interim disclosures about material changes, as necessary.

Item 3 Table of Contents

Item 1	Cover Page	1
Item 2	Material Changes	2
Item 3	Table of Contents	3
Item 4	Advisory Business	4
Item 5	Fees and Compensation	9
Item 6	Performance-Based Fees and Side-By-Side Management	12
Item 7	Types of Clients	13
Item 8	Methods of Analysis, Investment Strategies and Risk of Loss	13
Item 9	Disciplinary Information	15
Item 10	Other Financial Industry Activities and Affiliations	15
Item 11	Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	17
Item 12	Brokerage Practices	18
Item 13	Review of Accounts	21
Item 14	Client Referrals and Other Compensation	22
Item 15	Custody	23
Item 16	Investment Discretion	23
Item 17	Voting Client Securities	23
Item 18	Financial Information	24

Item 4 Advisory Business

Reinking Financial Consulting is a Minnesota-registered investment adviser firm with its principal place of business located in that state. **Reinking Financial Consulting** ("**RFC**") began conducting business in **2003** and operated initially as a Limited Liability Corporation (Reinking Financial Consulting LLC) until 12/11/2008 when is changed to its current form.

The following information identifies person(s) that indirectly own 25% or more of our firm:

- Luis Ricardo Reinking, CFA, MBA

At **RFC**, we offer the following advisory services to our clients:

INDIVIDUAL PORTFOLIO MANAGEMENT

Our firm provides continuous asset management of client funds based on the individual needs of each client. Through personal discussions, in which the goals and objectives of each client are considered, we develop the client's Personal Investment Policy. We then create and manage an investment portfolio based on that policy. During our data-gathering process, we determine the client's individual financial objectives, time horizons, risk tolerance, risk preference and liquidity needs. As appropriate, we may also review and discuss a client's prior investment history, as well as family composition and background.

We manage these advisory accounts on a discretionary basis. Account supervision is guided by the client's stated objectives, as well as particular tax considerations. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors.

Once the client's portfolio has been established, we review the portfolio regularly (most often, daily) and, as necessary, re-balance the portfolio based on the client's individual needs.

Our investment recommendations are not limited to any specific product or service offered by a broker-dealer, bank or insurance company and will generally include advice regarding the following securities:

- Exchange-listed securities
- Securities traded over the counter
- Foreign issuers
- Corporate debt securities
- Certificates of deposit
- Exchange-Traded Funds
- Municipal securities
- Variable annuities
- Mutual fund shares

- United States governmental securities
- Interests in partnerships
- Hedge funds

Because some types of investments involve additional degrees of risk, their use will only be recommended when consistent with the client's stated investment objectives, tolerance for risk, liquidity needs and suitability.

EMPLOYEE BENEFIT RETIREMENT PLAN CONSULTING SERVICES

We also provide full investment advisory services for retirement plans. While the primary clients for these services will be pension, profit sharing and 401(k) plans, we also offer these services, where appropriate, to individuals and trusts, estates, and charitable organizations. These services are comprised of four distinct services. Clients may choose to use any or all services.

Investment Policy Statement Preparation (hereinafter referred to as "IPS")

We will meet with the client to determine an appropriate investment strategy that reflects the plan sponsor's stated investment objectives for management of the plan. Our firm then prepares a written IPS detailing those needs and goals, including an encompassing policy under which these goals are to be achieved. The IPS also lists the criteria for selection of investment vehicles as well as the procedures and timing interval for monitoring of investment performance.

Selection of Investment Vehicles

We assist plan sponsors in constructing appropriate asset allocation models. We will then review various mutual funds (both index and managed) to determine which investments are appropriate to implement the client's IPS. The number of investments to be recommended will be determined by the client, based on the IPS.

Monitoring of Investment Performance

We monitor client investments continually, based on the procedures and timing intervals delineated in the Investment Policy Statement. We supervise the client's portfolio and will make recommendations to the client as market factors and the client's needs dictate.

Employee Communications

For pension, profit sharing and 401(k) plan clients with individual plan participants exercising control over assets in their own account ("self-directed plans"), we may also provide educational support and investment workshops designed for the plan participants. The nature of the topics to be covered will be determined by us and the client under the guidelines established in ERISA Section 404(c). The educational support and investment workshops will NOT provide plan participants with individualized, tailored investment advice or individualized, tailored asset allocation recommendations.

FINANCIAL PLANNING

We provide financial planning services to selected clients. Financial planning is a comprehensive evaluation of a client's current and future financial state by using currently known variables to predict future cash flows, asset values and withdrawal plans. Through the financial planning process, all questions, information, and analysis are considered as they impact and are impacted by the entire financial and life situation of the client. Clients purchasing this service receive a written report which provides the client with a detailed financial plan designed to assist the client achieve his or her financial goals and objectives.

In general, the financial plan can address any or all the following areas:

- **PERSONAL:** We review family records, budgeting, personal liability, estate information and financial goals.
- **TAX & CASH FLOW:** We analyze the client's income tax and spending and planning for past, current and future years; then illustrate the impact of various investments on the client's current income tax and future tax liability.
- **INVESTMENTS:** We analyze investment alternatives and their effect on the client's portfolio.
- **INSURANCE:** We review existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home and automobile.
- **RETIREMENT:** We analyze current strategies and investment plans to help the client achieve his or her retirement goals.
- **DEATH & DISABILITY:** We review the client's cash needs at death, income needs of surviving dependents, estate planning and disability income.
- **ESTATE:** We assist the client in assessing and developing long-term strategies, including as appropriate, living trusts, wills, review estate tax, powers of attorney, asset protection plans, nursing homes, Medicaid and elder law.

We gather required information through in-depth personal interviews. Information gathered includes the client's current financial status, tax status, future goals, returns objectives and attitudes towards risk. We carefully review documents supplied by the client, including a risk tolerance questionnaire completed by the client, and prepare a written report. Should the client choose to implement the recommendations contained in the plan, we suggest the client work closely with his/her attorney, accountant, and insurance agent. Implementation of financial plan recommendations is entirely at the client's discretion.

We also provide general non-securities advice on topics that may include tax and budgetary planning, estate planning, income planning, retirement planning and business planning.

Typically, the financial plan is presented to the client within one to two weeks of the contract date, provided that all information needed to prepare the financial plan has been promptly provided.

Financial Planning recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company. All recommendations are of a generic nature.

AMOUNT OF MANAGED ASSETS

As of **04/07/2024**, we were actively managing 100% of clients' assets on a discretionary basis.

Item 5 Fees and Compensation

PORTFOLIO MANAGEMENT SERVICE FEES

The annualized fee for these services is charged as a percentage of assets under management, according to the following schedule:

Account Balance	Annual Advisory Fee
Up to \$ 1,000,000	1.25%
\$1,000,001 to \$5,000,000	1.00%
\$5,000,001 to \$10,000,000	0.90%
\$10,000,000 or above	negotiable

A minimum of **\$1,000,000** of assets under management is generally required for our services. This account size may be negotiable under certain circumstances. Clients are billed in advance upon account funding and at the beginning of each calendar quarter thereafter.

Reinking Financial Consulting may group certain related client accounts for the purposes of achieving the minimum account size and determining the annualized fee.

Limited Negotiability of Advisory Fees: Although **RFC** has established the fee schedule above, we retain the discretion to negotiate alternative fees on a client-by-client basis. Client facts, circumstances and needs are considered in determining the fee schedule. These include the complexity of the client, number and complexity of related accounts, number of custodians, total assets to be placed under management, anticipated future additional assets, portfolio style, account composition, reports, among other factors. The specific annual fee schedule is identified in the contract between the adviser and the client.

Discounts, not generally available to our advisory clients, may be offered to family members and friends of associated persons of our firm.

EMPLOYEE BENEFIT RETIREMENT PLAN CONSULTING FEES

Our fees for Employee Benefit Retirement Plan Consulting Services are based on a percentage of assets under advisement, according to the following schedule:

Account Balance	Annual Fee
\$ 0 to \$ 249,999	1.60%
\$ 250,000 to \$ 499,999	1.10%
\$ 500,000 to \$ 749,999	0.95%
\$ 750,000 to \$ 999,999	0.85%
\$1,000,000 to \$1,999,999	0.75%
\$2,000,000 to \$2,999,999	0.70%
\$3,000,000 to \$3,999,999	0.65%
\$4,000,000 to \$4,999,999	0.60%
\$5,000,000 to \$7,499,999	0.55%
More than \$7,500,000	0.50%

Plan sponsors are invoiced in advance at the beginning of each calendar quarter.

A minimum of **\$2,000,000** of assets under management is generally required for this service. This minimum amount may prevent **Reinking Financial Consulting** from providing services to small ERISA plans.

FINANCIAL PLANNING FEES

Reinking Financial Consulting's Financial Planning fee is determined based on the nature of the services being provided and the complexity of each client's circumstances. All fees are agreed upon prior to signing a contract with any client.

Our Financial Planning fees are calculated and charged on an hourly basis, ranging from \$350 to \$500 per hour. Although the length of time it will take to provide a Financial Plan will depend on each client's personal situation, we will provide an estimate for the total hours at the start of the advisory relationship.

Financial Planning Fee Offset: **Reinking Financial Consulting** reserves the discretion to reduce or waive the hourly fee and/or the minimum fixed fee if a financial planning client chooses to engage us for our Portfolio Management Services.

The client is billed monthly in arrears based on actual hours accrued.

GENERAL INFORMATION

Termination of the Advisory Relationship: A client agreement may be canceled at any time, **by either party**, for any reason upon receipt of 30 days written notice. As disclosed above, certain fees are paid in advance of services provided. Upon termination by **RFC** of any account, any prepaid, unearned fees will be promptly refunded on a pro-rated basis. Terminations by the client will **not** result in refunds of any fees. In calculating a client's reimbursement of fees, we will pro-rate the reimbursement according to the number of days remaining in the billing period.

Mutual Fund Fees: All fees paid to **Reinking Financial Consulting** for investment advisory services are separate and distinct from the fees and expenses charged by any investment vehicles (e.g.: mutual funds, hedge funds and/or ETFs) to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge. A client could invest in a mutual fund directly, without our services. In that case, the client would not receive the services provided by our firm which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and our fees to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided. Due to their typically high fee-structure and tax issues, we only recommend mutual funds in select cases.

Additional Fees and Expenses: In addition to our advisory fees, clients are also responsible for the fees and expenses charged by custodians and imposed by broker dealers, including, but not limited to any transaction charges imposed by a broker dealer with which an independent investment manager effects transactions for the client's account(s). Please refer to the "Brokerage Practices" section (Item 12) of this Form ADV for additional information.

Grandfathering of Minimum Account Requirements: Pre-existing advisory clients are subject to **Reinking Financial Consulting's** minimum account requirements and advisory fees in effect at the time the client entered the advisory relationship. Therefore, our firm's minimum account requirements will differ among clients.

ERISA Accounts: **Reinking Financial Consulting** is deemed to be a **fiduciary** to advisory clients that are employee benefit plans or individual retirement accounts (IRAs) pursuant to the Employee Retirement Income and Securities Act ("ERISA"), and regulations under the Internal Revenue Code of 1986 (the "Code"), respectively. As such, our firm is subject to specific duties and obligations under ERISA and the Internal Revenue Code that include among other things, restrictions concerning certain forms of compensation. To avoid engaging in prohibited transactions, **Reinking Financial Consulting** may only charge fees for investment advice about products for which our firm and/or our related persons do not receive any commissions or 12b-1 fees, or conversely, investment advice about products for which our firm and/or our related persons receive commissions or 12b-1 fees, however, only when such fees are used to offset **Reinking Financial Consulting's** advisory fees.

Advisory Fees in General: Clients should note that similar advisory services may (or may not) be available from other registered (or unregistered) investment advisers for similar or lower fees.

Limited Prepayment of Fees: Under no circumstances do we require or solicit payment of fees more than \$2,000 more than six months in advance of services rendered.

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

To avoid any conflicts of interest, **Reinking Financial Consulting** does not charge performance-based fees.

Item 7 Types of Clients

Reinking Financial Consulting provides advisory services to the following types of clients:

- Individuals
- Pension and profit-sharing plans
- Estates and trusts

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

METHODS OF ANALYSIS

We use the following methods of analysis in formulating our investment advice and/or managing client assets:

Asset Allocation. Rather than focusing primarily on security-selection, we attempt to identify an appropriate ratio of cash, fixed income, and equity securities suitable to the client's investment goals and risk-preference.

A risk of asset allocation is that the client may not participate in sharp increases in a particular security, industry, or market sector. Another risk is that the ratio of securities, fixed income, and cash will change over time due to stock and market movements and, if not corrected, will no longer be appropriate for the client's goals.

Fundamental Analysis. We attempt to measure the intrinsic value of a security by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management of the company itself) to determine if the company is underpriced (indicating it may be a good time to buy) or overpriced (indicating it may be time to sell).

Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.

Mutual Fund and/or ETF Analysis. We look at the experience and track record of the manager of the mutual fund or ETF to determine if that manager has demonstrated an ability to invest over a period and in different economic conditions. We also look at the underlying assets in a mutual fund or ETF to determine if there is significant overlap in the underlying investments held in other fund(s) in the client's portfolio. We also monitor the funds or ETFs to determine if they are continuing to follow their stated investment strategy.

A risk of mutual fund and/or ETF analysis is that, as in all securities investments, **past performance does not guarantee future results**. A manager who has been successful may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a fund or ETF, managers of different funds held by the client may purchase the same security, increasing the risk to the client if that security were to fall in value. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the fund or ETF, which could make the holding(s) less suitable for the client's portfolio.

Sources of Information. Our security analysis is based on several factors including those derived from commercially available software technology, securities rating services, general market and financial information, due diligence reviews and specific investment analysis that clients may request. Our main sources of information include commercially available investment services, financial newspapers, periodicals, and issuer-prepared information.

Risks for All Forms of Analysis. Our securities analysis methods rely on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, and other publicly available sources of information about these securities, are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

INVESTMENT STRATEGIES

We use the following strategies in managing client accounts, provided that such strategies are appropriate to the needs of the client and consistent with the client's investment objectives, risk-tolerance, risk-preference, and time horizons, among other considerations:

Long-term purchases. We primarily purchase securities with the idea of holding them in the client's account for a year or longer incorporating the principles of **Modern Portfolio Theory**. This investment approach is firmly rooted in empirically based, statistical evidence that markets are, for practical matters, relatively "efficient" and that investors' returns are determined principally by asset allocation decisions, **not** by "market timing" or "stock picking."

We focus on developing diversified portfolios, principally using passively managed, asset class mutual funds and/or Exchange-Traded Funds ("ETFs").

A risk in a long-term purchase strategy is that by holding the security for this length of time, we may not take advantage of short-term gains that could be profitable to a client. Moreover, if our predictions are incorrect, a security may decline sharply in value before we make the decision to sell.

Short-term purchases. Occasionally, we purchase securities with the idea of selling them within a relatively short time (typically a year or less). We do this to give consideration of client-specific circumstances.

Although all investments involve risk, our investment recommendations seek to limit risk through broad diversification and investment in conservative fixed income securities. Our investment philosophy is designed for investors who desire a "**buy-and-hold**" strategy, with an investment time horizon of a minimum of five years, and preferably ten years or more. Frequent trading of securities increases brokerage and other transaction costs that our philosophy seeks to minimize. Investors who do not commit to **Modern Portfolio Theory**

philosophy may not generally achieve positive long-term results.

Item 9 Disciplinary Information

We are required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management.

Our firm and our management personnel have **no** reportable disciplinary events to disclose.

Item 10 Other Financial Industry Activities and Affiliations

Management personnel of **Reinking Financial Consulting** may also be passive member(s) of other limited liability companies (LLCs) and/or general partner(s) to limited partnerships (LPs) formed for investment purposes. Our advisory clients are not solicited to invest in such LLCs and/or LPs. These related persons of our firm may receive investment advisory compensation in relation to these investments, but there is **not** a conflict of interest because our clients are not solicited to invest in these.

Clients should be aware that any receipt of additional compensation by **Reinking Financial Consulting** and its management persons or employees would create a conflict of interest that may impair the objectivity of our firm and these individuals when making advisory recommendations. Therefore, **Reinking Financial Consulting** will **not** engage in such activities and will **always** put the interest of its clients first - a part of our fiduciary duty as a registered investment adviser.

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

Our firm has adopted the **CFA Code of Ethics** which sets forth high ethical standards of business conduct that we require of our employees, including compliance with applicable federal securities laws.

Reinking Financial Consulting and our personnel owe a duty of loyalty, fairness and good faith towards our clients, and have an obligation to adhere not only to the specific provisions of the *Code of Ethics* but to the general principles that guide the Code.

Our *Code of Ethics* includes policies and procedures for the review of quarterly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by the firm's access persons. Among other things, our *Code of Ethics* also requires the prior approval of any acquisition of securities in a limited offering (e.g., private placement) or an initial public offering. Our code also provides for oversight, enforcement, and record-keeping provisions.

Reinking Financial Consulting's *Code of Ethics* includes a firm's policy prohibiting the use of material non-public information. All employees are reminded that such information may not be used in a personal or professional capacity.

A copy of our *Code of Ethics* is available to our advisory clients and prospective clients. You may request a copy by email sent to **Compliance@ReinkingFinancialConsulting.com**, or by calling us at **952-949-2166**.

Our *Code of Ethics* is designed to ensure that the personal securities transactions, activities and interests of our employees will not interfere with (i) making decisions in the best interest

of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts.

Our firm and/or individuals associated with our firm may buy or sell for their personal accounts securities identical to or different from those recommended to our clients. In addition, any related person(s) may have an interest or position in a certain security(ies) which may also be recommended to a client.

As these situations represent actual or potential conflicts of interest to our clients, we have established the following policies and procedures for implementing our firm's regulatory obligations and provide our clients and potential clients with full and fair disclosure of such conflicts of interest:

1. No principal or employee of our firm may put his or her own interest above the interest of an advisory client.
2. No principal or employee of our firm may buy or sell securities for their personal portfolio(s) where their decision is a result of information received as a result of his or her employment unless the information is also available to the investing public.
3. It is the expressed policy of our firm that no person employed by us may purchase or sell any security prior to a transaction(s) being implemented for an advisory account. This prevents such employees from benefiting from transactions placed on behalf of advisory accounts.
4. Our firm requires prior approval for any IPO or private placement investments by related persons of the firm.
5. We have established procedures for the maintenance of all required books and records.
6. All our principals and employees must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices.
7. We require delivery and acknowledgment of the *Code of Ethics* by each supervised person of our firm.
8. We have established policies requiring the reporting of *Code of Ethics* violations to our senior management.
9. Any individual who violates any of the above restrictions may be subject to termination.

Item 12 Brokerage Practices

Reinking Financial Consulting will not request the discretionary authority to determine the broker dealer to be used or the commission rates to be paid for mutual funds and equity securities transactions, therefore, clients must direct us as to the broker dealer to be used. As a matter of practice, **Reinking Financial Consulting** may not block client trades and, therefore, we may implement client transactions separately for each account. Consequently, certain client trades may be executed before others, at a different price and/or commission rate. However, our clients may receive volume discounts available as we often block client trades.

We may directly arrange client transactions in fixed income securities or may further provide this authority to a fixed income manager retained by us on the client's behalf with client permission. Fixed income managers are given trading authority over client's brokerage account. Clients will be provided with the Disclosure Brochure (Form ADV Part II) of the portfolio manager.

Reinking Financial Consulting does not have any "soft-dollar" arrangements and does not receive any soft-dollar benefits.

Reinking Financial Consulting may recommend that clients establish brokerage accounts with **Schwab Institutional** a division of **Charles Schwab & Co., Inc.** ("**Schwab**"), a **FINRA** registered broker-dealer, member **SIPC**, to maintain custody of clients' assets and to effect trades for their accounts. Although we recommend that clients establish accounts at **Schwab**, it is the client's decision to custody assets with Schwab. **Reinking Financial Consulting** is independently owned and operated and not affiliated with **Schwab**.

Schwab provides **Reinking Financial Consulting** with access to its institutional trading and custody services, which are typically not available to **Schwab** retail investors. These services generally are available to independent investment advisers on an unsolicited basis, at no charge to them so long as a total of at least **\$10 million** of the adviser's clients' assets are maintained in accounts at **Schwab Institutional**. These services are not contingent upon our firm committing to Schwab any specific amount of business (assets in custody or trading commissions). Schwab's brokerage services include the execution of securities transactions, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

Schwab enables **Reinking Financial Consulting** to obtain many no-load mutual funds without transaction charges and other no-load funds at nominal transaction charges. **Schwab's** commission rates are generally considered discounted from customary retail commission rates. However, the commissions and transaction fees charged by **Schwab** may be higher or lower than those charged by other custodians and broker-dealers. As a result of receiving such services for no additional cost, we may have an incentive to continue to use or expand the use of **Schwab's** services. We examined this potential conflict of interest when we chose to sign our relationship with **Schwab** and have determined that the relationship is **in the best interests of Reinking Financial Consulting's clients** and satisfies our obligation to them to seek best execution. A client may pay a commission that is higher than another qualified broker-dealer might charge to affect the same transaction where we determine in good faith that the commission is reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution,

taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, while **Reinking Financial Consulting** will seek competitive rates, to the benefit of all clients, we may not necessarily obtain the lowest possible commission rates for specific client account transactions. Although the investment research products and services that may be obtained by us will generally be used to service all our clients, a brokerage commission paid by a specific client may be used to pay for research that is not used in managing that specific client's account.

For our client accounts maintained in its custody, *Schwab* generally does not charge separately for custody services but is compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed through *Schwab* or that settle into *Schwab* accounts.

Schwab Institutional also makes available to our firm other products and services that benefit **Reinking Financial Consulting** but may not directly benefit our clients' accounts. Many of these products and services may be used to service all or some substantial number of our client accounts, including accounts not maintained at *Schwab*.

Schwab's products and services that assist us in managing and administering our clients' accounts include software and other technology that

- i. Provide access to client account data (such as trade confirmations and account statements),
- ii. Facilitate trade execution,
- iii. Provide research, pricing, and other market data,
- iv. Facilitate payment of our fees from clients' accounts; and
- v. Assist with back-office functions, record-keeping, and client reporting.

Schwab Institutional also offers other services intended to help us manage and further develop our business enterprise. These services may include:

- i. Compliance, legal and business consulting,
- ii. Publications and conferences on practice management and business succession, and
- iii. Access to employee benefits providers, human capital consultants and insurance providers.

Schwab may make available, arrange, and/or pay third-party vendors for the types of services rendered to **Reinking Financial Consulting**. *Schwab Institutional* may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to our firm. *Schwab Institutional* may also provide other benefits such as educational events or occasional business entertainment of our personnel. In evaluating whether to recommend that clients custody their assets at *Schwab*, we may take into account the availability of some of the foregoing products and services and other arrangements as part of the total mix of factors we consider and not solely on the nature, cost or quality of custody and brokerage services provided by *Schwab*, which may create a potential conflict of interest.

Reinking Financial Consulting's financial planning and consulting practice, due to the nature of its business and client needs, does not include negotiating commissions with broker dealers or obtaining volume discounts, nor necessarily obtaining the best price, and may not block trades. Clients will be required to select their own broker dealers and insurance companies for the implementation of financial planning recommendations. We may recommend any one of several brokers. Our clients must independently evaluate these brokers before opening an account. The factors considered by us when making this recommendation are the broker's ability to provide professional services, our experience with the broker, the broker's reputation, and the broker's financial strength, among other factors. Our financial planning clients may use any broker or dealer of their choice.

Item 13 Review of Accounts

PORTFOLIO MANAGEMENT SERVICES

REVIEWS: While the underlying securities within a client's accounts are continually monitored, these accounts are reviewed at least quarterly. Accounts are reviewed in the context of each client's stated investment objectives and guidelines. More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances, or the market, political or economic environment. These accounts are reviewed personally by our President (Ricardo Reinking, MBA, CFA).

REPORTS: In addition to the monthly statements and confirmations of transactions that clients receive from their broker-dealer, **Reinking Financial Consulting** will provide quarterly reports summarizing account performance, balances and holdings.

EMPLOYEE BENEFIT RETIREMENT PLAN CONSULTING SERVICES

REVIEWS: **Reinking Financial Consulting** will review the client's Investment Policy Statement (IPS) whenever the client advises us of a change in circumstances regarding the needs of the plan. **Reinking Financial Consulting** will also review the investment options of the plan according to the agreed upon time intervals established in the IPS. Such reviews will generally occur quarterly. These accounts are reviewed by Ricardo Reinking, MBA, CFA.

REPORTS: **Reinking Financial Consulting** will provide reports to *Employee Benefit Retirement Plan Consulting Services* clients based on the terms set forth in the client's Investment Policy Statement (IPS).

FINANCIAL PLANNING SERVICES

REVIEWS: While reviews may occur at different stages depending on the nature and terms of the specific engagement, typically no formal reviews will be conducted for Financial Planning clients unless otherwise contracted for.

REPORTS: Financial Planning clients will receive a completed financial plan. Additional reports will not typically be provided unless otherwise contracted for.

Item 14 Client Referrals and Other Compensation

CLIENT REFERRALS

Our firm may pay referral fees to independent persons or firms ("Solicitors") for introducing clients to us. Whenever we pay a referral fee, we require the Solicitor to provide the prospective client with a copy of this document (our *Firm Brochure*) and a separate disclosure statement that includes the following information:

- the Solicitor's name and relationship with our firm
- the fact that the Solicitor is being paid a referral fee
- the amount of the fee, and
- whether the fee paid to us by the client will be increased above our normal fees in order to compensate the Solicitor.

As a matter of firm practice, the advisory fees paid to us by clients referred by solicitors are **not** increased because of any referral.

It is **Reinking Financial Consulting's** policy **not** to allow our related persons to accept any form of compensation, including cash, sales awards, or other prizes, from a non-client in conjunction with the advisory services we provide to our clients.

Item 15 Custody

Our firm directly debits advisory fees from client accounts - - see "Fees and Compensation" section (Item 5).

As part of this billing process, the client's custodian is advised of the amount of the fee to be deducted from that client's account. On at least a quarterly basis, the custodian is required to send to the client a statement showing all transactions within the account during the reporting period.

Because the custodian does not calculate the amount of the fee to be deducted, it is important for clients to carefully review their custodial statements to verify the accuracy of the calculation, among other things. Clients should contact us directly if they believe that there may be an error in their statement.

In addition to the periodic statements that clients receive directly from their custodians, we also send account reviews directly to our clients on a quarterly basis. We urge our clients to carefully compare the information provided on these documents to ensure that all account transactions, holdings, and values are correct and current.

Our firm does **not** have actual or constructive custody of client accounts.

Item 16 Investment Discretion

Clients typically hire us to provide **discretionary** asset management services, in which case we place trades in a client's account without contacting the client prior to each trade to obtain the client's permission.

Our discretionary authority includes the ability to do the following without contacting the client:

- determine the security to buy or sell,
- determine the amount of the security to buy or sell, and/or
- trade based on our determinations.

Clients give us discretionary authority when they sign a discretionary agreement with our firm and may limit this authority by giving us written instructions. Clients may change/amend such limitations by providing us with subsequent written instructions.

For fixed income securities, this authority will include the discretion to retain a third-party money manager for fixed income accounts.

Item 17 Voting Client Securities

Reinking Financial Consulting does not vote proxies for client accounts; however, clients always have the right to vote proxies themselves. As a client, you can exercise this right by instructing us in writing.

We will neither advise nor act on behalf of the client in legal proceedings involving companies whose securities are held in the client's account(s), including, but not limited to, the filing of "Proofs of Claim" in class action settlements. If desired, clients may direct us to transmit copies of class action notices to the client or a third party. Upon such direction, we will make reasonable efforts to forward such notices in a timely manner.

With respect to ERISA accounts, we do not vote proxies.

Item 18 Financial Information

Under no circumstances do we require or solicit payment of fees more than \$2,000 per client more than six months in advance of services rendered. Therefore, we are not required to include a financial statement.

As an advisory firm that maintains discretionary authority for client accounts, we are also required to disclose any financial condition that is reasonable likely to impair our ability to meet our contractual obligations. **Reinking Financial Consulting** has no additional financial circumstances to report.

Reinking Financial Consulting has not been the subject of any bankruptcy petition at any time.