

Rinkey Investments

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FORM ADV PART 2A BROCHURE

This brochure provides information about the qualifications and business practices of Rinkey Investments. If you have any questions about the contents of this brochure, contact us at 858-246-6855. 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 Rinkey Investments is available on the SEC's website at www.adviserinfo.sec.gov.

Rinkey Investments is a registered investment adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

Item 2 Summary of Material Changes

Form ADV Part 2 requires registered investment advisers to amend their brochure when information becomes materially inaccurate. If there are any material changes to an adviser's disclosure brochure, the adviser is required to notify you and provide you with a description of the material changes.

Since the filing of our last annual updating amendment dated February 19, 2019, we have the following material changes to report:

Private Collective Investment Vehicles: Illumination recommends that certain clients invest in privately placed collective investment vehicles (e.g., private real estate funds, etc.). The managers of these vehicles have broad discretion in selecting the investments. There are few limitations on the types of securities or other financial instruments which may be traded and no requirement to diversify. In addition, because the vehicles are not registered as investment companies, there is an absence of regulation. There are numerous other risks in investing in these securities. Clients should consult each fund's private placement memorandum and/or other documents explaining such risks prior to investing.

We will also use Charles Schwab as custodian.

Item 3 Table of Contents

Item 1 Cover Page	Page 1
Item 2 Summary of Material Changes	Page 2
Item 3 Table of Contents	Page 3
Item 4 Advisory Business	Page 4
Item 5 Fees and Compensation	Page 7
Item 6 Performance-Based Fees and Side-By-Side Management	Page 13
Item 7 Types of Clients	Page 13
Item 8 Methods of Analysis, Investment Strategies and Risk of Loss	Page 13
Item 9 Disciplinary Information	Page 18
Item 10 Other Financial Industry Activities and Affiliations	Page 18
Item 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	Page 19
Item 12 Brokerage Practices	Page 19
Item 13 Review of Accounts	Page 21
Item 14 Client Referrals and Other Compensation	Page 21
Item 15 Custody	Page 21
Item 16 Investment Discretion	Page 22
Item 17 Voting Client Securities	Page 22
Item 18 Financial Information	Page 22
Item 19 Requirements for State-Registered Advisers	Page 22
Item 20 Additional Information	Page 23

Item 4 Advisory Business

Description of Services and Fees

Rinkey Investments dba Illumination Wealth Management (hereinafter "IWM") is a registered investment adviser based in San Diego, California. We are organized as a corporation under the laws of the State of California. We have been providing investment advisory services since 2009. Mathew Seth Rinkey is our principal owner.

The following paragraphs describe our services and fees. Please refer to the description of each investment advisory service listed below for information on how we tailor our advisory services to your individual needs. As used in this brochure, the words "we", "our" and "us" refer to Rinkey Investments and the words "you", "your" and "client" refer to you as either a client or prospective client of our firm.

We use the terms "we" and "our" throughout this disclosure brochure to refer to Matthew Seth Rinkey. The use of these terms is not intended to imply that there is more than one individual associated with Rinkey Investments.

Financial Life Management Services

We offer comprehensive, fee-only Financial Life Management services for all areas of our client's financial life. Financial Life Management is the process of meeting your life goals through the development and proper management of your financial resources. Life goals may include: buying a home; planning for retirement; saving for college; funding a business; or leaving a legacy, among others. We place a strong emphasis on the link between money and values. Our process is client focused and collaborative. Our Financial Life Management services include both Financial Planning and Investment Management on an ongoing basis.

Financial Planning

Financial Planning is an all-inclusive process, requiring review and analysis of all aspects of your financial situation that can include:

Income Management - Focuses on planning for income and taxes. This consists of analyzing current and future cash flow objectives and needs, budgeting, evaluating employment benefits, and income tax planning.

Retirement Planning - Focuses on establishing a retirement goal and applying strategies to fund retirement and ensure adequate retirement income.

Debt Management - Focuses on tracking and analysis of personal debt and net worth. Personal debt is typically divided into home loans, such as mortgages and home equity lines of credit, personal loans, and business debt.

Education Planning - Consists of strategic planning to help you fund education goals.

Estate Planning - Consists of strategic planning for asset transfer at death as well as the tracking of any documents that may be relevant to an individual's estate. It also involves charitable planning and gifting strategies. This includes beneficiary designations, legal documents such as trusts and wills, and the assignment of legal representatives.

Asset Protection (Insurance) Covers wealth management strategies that intend to preserve an individual's wealth and protect it from potential risks. This consists primarily of various types of insurance: life insurance, disability, long-term care insurance, property and casualty insurance, and medical insurance.

Investment Planning - Concerned with the ownership and maintenance of any assets reflected on an individual's balance sheet as well as the appropriate investment management for the individual's portfolio of assets. This includes individual savings, managed investment accounts, qualified retirement plans, business ownership, home ownership, and non-traditional assets.

The financial planning process consists of a series of steps taken to help you, our client, accomplish your goals.

1. We work with you to identify *your* goals and objectives
2. We gather the information pertinent to *your* overall financial situation such as income, expenses, assets, liabilities, taxes, insurance coverage, retirement plans, investments, wills and trusts
3. We review *your* current financial situation based upon the information we have gathered
4. We provide recommendations and strategies for achieving *your* goals
5. We assist *you* in implementing the recommendations
6. We monitor *your* plan on an on-going basis for needed changes

Investment Management Services

Our firm provides on-going investment management services to our clients. Our philosophy relies on a long-term investment strategy determined by your needs and objectives. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, we develop a client's personal investment policy and create and manage a portfolio based on that policy. During our data-gathering process, we determine the client's individual objectives, time horizons, risk tolerance, and liquidity needs. As appropriate, we also review and discuss a client's prior investment history, as well as family composition and background.

Utilizing allocation strategies, our client portfolios are diversified to minimize sector and industry risk. Our investment recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company and will generally include advice regarding the following securities: Mutual Funds, Exchange Traded Funds, Closed End Funds, Individual Equity Securities, and Individual Fixed Income Securities.

Investment management services are provided on a discretionary or non-discretionary basis.

Pension Consulting

We will provide pension-consulting services to employee benefit plans and their fiduciaries based upon an analysis of the needs of the plan. In general, these services may include any one or all of the following:

- Marketplace Search - We will search the marketplace and provide quotations from leading retirement plan service providers.
- Service Provider Analysis - We will analyze data regarding fees and services of responding retirement plan service providers, including plan features and service standards.
- Recommendations - We will make recommendations regarding plan service provider.
- Investment Advice (Plan Level) - We will provide research and analysis with regard to investment advice and fiduciary due diligence services for the Client. Services provided by the Adviser will not include any services with respect to employer securities or company stock. The Adviser shall also provide research and analysis that covers the investment products of several qualified and non-qualified retirement plan providers. We may employ many different calculations, processes, and screening techniques to arrive at specific recommended individual investments within the array of investments offered by each investment provider that is being

analyzed.

- Existing Plan Review - A plan review is an examination of major components of your retirement plan in order to identify strengths and weaknesses. The review can cover such areas as overall plan structure, related costs, and plan documentation.
- Ongoing Consulting - We will provide annual investment reviews of the plan's investments to ensure suitability of investments and conformity with the plan's investment policy statement. In some instances, where we determine that current plan investments are under performing, we will make general, and occasionally specific, recommendations as to re-balancing of plan assets in various investment media, including exchange-traded funds, mutual funds and non-securities investments.
- Employee Plan and Investment Education - The Advisor may provide group employee enrollment, re-enrollment, and investment education support. The goal of this process is to help employees make educated and informed choices about the plan and investment allocation under the investment education guidelines set forth by the U.S. Department of Labor. Meetings are offered on an annual, semi-annual, quarterly, or as requested basis. The scope of the meetings will be group and/or individual, and will be conducted on-site and/or as data conferencing.
- Employee (Participant) Investment Advice - The Adviser may assist Plan Participants in making asset allocation decisions for their investment portfolios (i.e. between equity and fixed income). The goal of this process is to assist Plan Participants in finding the asset mix which is most likely to meet their investment objectives within acceptable risk parameters. Asset class sub-types can include domestic large cap value equity, domestic large cap growth equity, domestic mid-cap value equity, domestic mid-cap growth equity, domestic small cap value equity, domestic small cap growth equity, international equity, core fixed income, short term fixed income, high yield fixed income, and other appropriate asset classes and investments. The Plan's participants and beneficiaries are expected to have different investment objectives, time horizons and risk tolerances. To meet these varying investment needs, participants and beneficiaries will be able to direct their account balances among a range of investment options to construct diversified portfolios that reasonably span the risk/return spectrum. Participants and beneficiaries alone bear the risk of investment results from the options and asset allocation that they select.

We will provide consulting services to the plan fiduciaries as described above. Typically, the named plan fiduciary must make the ultimate decision as to retaining the services of such investment advisers as we recommend. The plan fiduciary is free to seek independent advice about the appropriateness of any recommended services for the plan.

In providing services to the Plan, our status is that of an investment adviser registered with the State of California and other jurisdictions as required. We are not subject to any disqualifications under Section 411 of ERISA. In performing fiduciary services, we are acting as a non-discretionary fiduciary of the Plan as defined in Section 3(21), only. We do not act as a discretionary "investment manager" of the Plan as defined in Section 3(38) under ERISA.

Either party may terminate the pension consulting agreement by providing 30 days written notice to the other party. In the event the agreement is terminated, the client will incur charges for bona fide pension consulting services provided prior to such cancellation and fees will be due and payable by the client. Refunds are not applicable as fees are payable in arrears.

Client Tailored Services and Client Imposed Restrictions

IWM offers the same suite of services to all of its clients. However, specific client portfolios and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels) and is used to construct a client specific strategy to aid in the selection of a portfolio that matches restrictions, needs, and targets.

Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent IWM from properly servicing the client account, or if the restrictions would require IWM to deviate from its standard suite of services, IWM reserves the right to end the relationship.

Wrap Fee Programs

IWM does not participate in any wrap fee programs.

Types of Investments

We primarily offer advice on equity securities, exchange traded funds, mutual funds, corporate debt securities, commercial paper, certificates of deposit, municipal securities, US Government securities, commodities, interest in partnerships investing in real estate and others.

You may request that we refrain from investing in particular securities or certain types of securities. You must provide these restrictions to our firm in writing.

Assets Under Management

As of February 14, 2020, we provide continuous management services for \$78,591,285 in client assets on a discretionary basis, and \$1,511,003 in client assets on a non-discretionary basis. We also advise an additional \$27,225,871 in client assets not reported as continuously managed assets.

Item 5 Fees and Compensation

IWM receives no commissions, referral fees or expense reimbursements from any of our recommendations. The specific manner in which fees are charged by IWM is established in a client's written agreement with IWM. Clients may elect to be billed directly for fees or authorize IWM to directly debit fees from client accounts. In addition, clients may choose to pay for their services via credit card or ACH draft through unaffiliated secured third party processing stems. Clients also have the option of paying their fees on a monthly or quarterly basis. Accounts terminated during a calendar quarter/month will be charged a prorated fee if paying in arrears or prorated portion of the fee refunded if paying in advance. (A 30 day notice is required when terminating an account). Certain existing or legacy clients may be billed under a different fee schedule.

Fees for Financial Life Management

Clients engaging Illumination for the Financial Life Management Program are subject to a flat annual fixed fee, paid quarterly based on:

A percentage of the client's adjusted gross income (AGI) plus a percentage of the client's net worth based on the following tiered schedule:

Net Worth Between:	Fee %
\$0 to 2,000,000	0.50%
\$2,000,001 to \$3,000,000	0.40%
\$3,000,001 to \$5,000,000	0.30%
\$5,000,001 to \$10,000,000	0.20%
\$10,000,001 and Over	0.10%

and

Income (AGI) Between	Fee %
\$0 to 500,000	1.00%
\$500,001 to \$1,000,000	0.80%
\$1,000,001 to \$2,000,000	0.60%
\$2,000,001 and over	0.40%

Clients in the Financial Life Management program are subject to a minimum quarterly fee of \$2,000 and annual fee calculations are rounded to the nearest \$500. Financial Life Management fees may vary from the fee schedule based on the scope and complexity of the Client's engagement with our firm (e.g., Business planning, Business and/or Real Estate Ownership, Corporate or Private Equity, multiple entities, etc.).

In limited circumstances, our firm may utilize an alternative Advisor's Formula for the "Financial Life Management" Services. The alternative Advisor's Formula will be agreed upon in writing by both IWM and the client and illustrated in the agreement.

Fees are due quarterly (or monthly) in advance and a pro-rata refund will be paid to Client if canceled within any quarter. The initial quarterly fee may be applied on a pro-rata basis depending on the date of the executed client care agreement. This fixed fee is cancelable anytime without restriction. This fee may be debited from your investment accounts as agreed upon via your initials above, or you may choose to be invoiced at the beginning of each quarter.

No additional fee will be charged for Investment Management. The above fee calculation is compensation for both the Comprehensive Financial Life Planning and Investment Management Services. The Income (AGI) is obtained from the client's most recent tax filing. The net worth is calculated from the value of the client's assets and liabilities on the effective date of the client engagement. These fees are generally not negotiable. However, exceptions will be made on a case by case basis at the discretion of the managing member of IWM.

Should more accurate information about assets and liabilities become known within the first six months as part of our discovery process, IWM will add this new information to the original net worth statement to re-evaluate the fee based on the more accurate net worth statement. If there is a change in fee, it will be effective the next billing period going forward. When we expect to provide short-term or one-off planning or account services, we may complete them without additional fees. In situations where we expect our services to be long-term and ongoing, we may include this complexity in setting the client fee. Existing clients' may be under a different fee schedule than one above.

The fees will be adjusted at the beginning of the calendar quarter following the two year anniversary of the effective date and every two years thereafter based on Advisor's Formula. The client's then current income (AGI) and net worth will be used in Advisor's Formula to recalculate the fee or the factors that

make up the alternative Advisor's Formula. For example, if your agreement is effective as of February, your recalculated fee will be calculated two years later in March and effective the beginning of the following calendar quarter in April.

If IWM is unable to obtain current financial information in the month prior to the end of the 2 year anniversary quarter, IWM will contact the Client and request the missing information. If we have not received the financial information from you within 2 weeks, we may elect to use the most recent information we have on file or wait until you provide us with the requested information. If there will be a revision in the quarterly fee, the client shall be notified within 7 days of the effective date. The adjusted fee calculation will be provided to the client upon request.

Fees For Financial Planning

IWM requires a one-time set-up fee for Financial Planning only engagements ranging in the amount of \$0 - \$1,999 plus the first month's fee of \$100-\$999. The balance of fees due are payable monthly in equal installments at the beginning of each month. The service will automatically renew on an annual basis until you decide to terminate the Agreement to stop paying the fee.

This service is designed for clients who generally have less than \$200,000 of investable assets. This service is limited to ongoing financial planning and does not include ongoing investment management services.

For clients that choose to do a financial plan and then switch to financial life management, fees paid for services provided over the previous 6 months may be credited towards the 1st year's fees at IWM's discretion.

It is up to IWM to determine the level of services needed for a client. Fees, at times, are negotiable and based on the complexity of the plan or project and the range of services provided.

Fees for Investment Management Services

For clients who require Investment Management services only, the fee will be:

Assets Under Management Annual Fee Percentage

\$0 - \$99,999	\$1,500 Minimum
\$100,000 - \$249,999	1.50%
\$250,000 - \$499,999	1.35%
\$500,000 - \$999,999	1.20%
\$1,000,000 - \$2,999,999	1.00%
\$3,000,000 +	0.90%

These fees are negotiable and the final fee schedule will be attached as Exhibit II of the Investment Advisory Contract. Fees are paid quarterly in advance, and clients may terminate their contracts with seven days' written notice. Fees are due quarterly in advance and a pro-rata refund will be paid to Client if canceled within any quarter. Clients may terminate their accounts without penalty, for full refund, within 5 business days of signing the advisory contract. We will withdraw advisory fees directly from the client's accounts with written authorization. Advisory fees may also be invoiced and payment will be made to IWM via check. Lower fees for comparable services may be available from other sources.

In some cases, IWM's legacy clients may be receiving the same services but charged based on the fee schedule as it existed at the time those clients originally engaged our firm.

Fees for Pension Consulting Services

We will be compensated for initial plan consulting on a fixed fee payment option of \$500 - \$1,500 and such fee will be negotiated on a case-by-case basis based on the scope and complexity of the contracted services. Ongoing fees will be compensated by an annual fixed fee with a \$500 annual minimum paid quarterly in advance. At our discretion, these fees may be negotiable depending on the scope and complexity of the plan and services to be provided. In all circumstances, the fees to be paid and the fee-paying arrangements will be clearly set forth in the pension consulting agreement between us. You may terminate the pension consulting agreement within five days of the date of acceptance without penalty. Thereafter, either party may terminate the pension consulting agreement by providing (30) days written notice to the other party. The pension consulting fees will be pro-rated for the quarter in which the cancellation notice was given and any unearned fees will be refunded to you.

Payment of Fees

Payment of Financial Life Management Fees

Typically, IWM debits the financial life management fee directly from the client's account(s). Client fees may also be paid via credit or check through unaffiliated secured third party processing stems. Upon request, IWM will send an invoice to the client rather than directly debit the client's quarterly fee.

We will deduct our fee directly from your account through the qualified custodian holding your funds and securities. We will deduct our advisory fee only when the following requirements are met:

- You provide our firm with written authorization permitting the fees to be paid directly from your account held by the qualified custodian.
- We send you an invoice showing the amount of the fee, the value of the assets on which the fee is based, and the specific manner in which the fee was calculated.
- The qualified custodian agrees to send you a statement, at least quarterly, indicating all amounts dispersed from your account including the amount of the advisory fee paid directly to our firm.

We encourage you to reconcile our invoices with the statement(s) you receive from the qualified custodian. If you find any inconsistent information between our invoice and the statement(s) you receive from the qualified custodian please call our main office number located on the cover page of this brochure.

Payment of Financial Planning Fees

For clients who have only engaged us for Financial Planning services, fees may be paid via check or credit card through unaffiliated secured third party processing stems.

IWM requires initial fee of the financial planning or consulting fee payable upon entering the written agreement. The balance of fees due are payable monthly in equal installments at the beginning of each month. The service will automatically renew on an annual basis until you decide to terminate the Agreement to stop paying the fee.

Fixed Financial Planning fees are paid via check or credit card through unaffiliated secured third party processing stems. Fees are paid in advance, but never more than six months in advance, with the remainder due upon presentation of the plan. Fees that are charged in advance will be refunded based on the prorated amount of work completed at the point of termination.

Payment of Investment Management Fees

For clients who have only engaged us for Investment Management, our advisory fees are billed quarterly in advance and are withdrawn directly from the client's accounts with client written authorization.

Depending on the arrangements made at the time of the engagement, Clients may also have the option to pay fees quarterly via check.

We will deduct our fee directly from your account through the qualified custodian holding your funds and securities. We will deduct our advisory fee only when the following requirements are met:

- You provide our firm with written authorization permitting the fees to be paid directly from your account held by the qualified custodian.
- We send you an invoice showing the amount of the fee, the value of the assets on which the fee is based, and the specific manner in which the fee was calculated.
- The qualified custodian agrees to send you a statement, at least quarterly, indicating all amounts dispersed from your account including the amount of the advisory fee paid directly to our firm.

Clients Are Responsible For Third Party Fees

As part of our investment advisory services to you, we may invest, or recommend that you invest, in mutual funds and exchange traded funds. We will invest your account, when suitable, in no load mutual funds. The fees that you pay to our firm for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds or exchange traded funds (described in each fund's prospectus) to their shareholders. These fees will generally include a management fee and other fund expenses. You will also incur transaction charges and/or brokerage fees when purchasing or selling securities. These charges and fees are typically imposed by the broker-dealer or custodian through which your account transactions are executed. We do not share in any portion of the brokerage fees/transaction charges imposed by the broker-dealer or custodian. Additionally, certain accounts types of accounts will have nominal custodial fees charged to them. We do not share in those fees. To fully understand the total cost you will incur, you should review all the fees charged by mutual funds, exchange traded funds, our firm, and others. For information on our brokerage practices, please refer to the "Brokerage Practices" section of this Brochure.

Prepayment of Fees

Our quarterly fixed fees are billed and payable quarterly in advance based on the fee schedule and our agreement with you. For investment management only clients, our annual fee is billed and payable quarterly in advanced based on the value of your account on the last day of the previous quarter. For financial planning only clients, the initial fee as agreed upon will be paid upon the execution of the agreement.

If our advisory agreement for Financial Life Management or Investment Management services are executed at any time other than the first day of a calendar quarter, our fees will apply on a pro rata basis, which means that the advisory fee is payable in proportion to the number of days in the quarter for which you are a client. Our advisory fee is negotiable, depending on individual client circumstances.

If you have pre-paid advisory fees that we have not yet earned, you will receive a prorated refund of those fees.

We do not require you to pay fees six or more months in advance. Should the engagement last longer than six months between acceptance of financial planning agreement and delivery of the financial plan, any prepaid unearned fees will be promptly returned to you less a pro rata charge for bona fide financial planning services rendered to date.

Outside Compensation For the Sale of Securities to Clients

Neither IWM nor its supervised persons accept any compensation for the sale of securities or other investment products, including asset-based sales charges or services fees from the sale of mutual funds.

IRA Rollover Considerations

As part of our investment advisory services to you, we may recommend that you withdraw the assets from your employer's retirement plan and roll the assets over to an individual retirement account ("IRA") that we will manage on your behalf. If you elect to roll the assets to an IRA that is subject to our management, we will charge you an asset based fee as set forth in the agreement you executed with our firm. This practice presents a conflict of interest because persons providing investment advice on our behalf have an incentive to recommend a rollover to you for the purpose of generating fee based compensation rather than solely based on your needs. You are under no obligation, contractually or otherwise, to complete the rollover. Moreover, if you do complete the rollover, you are under no obligation to have the assets in an IRA managed by our firm.

Many employers permit former employees to keep their retirement assets in their company plan. Also, current employees can sometimes move assets out of their company plan before they retire or change jobs. In determining whether to complete the rollover to an IRA, and to the extent the following options are available, you should consider the costs and benefits of:

1. Leaving the funds in your employer's (former employer's) plan.
2. Moving the funds to a new employer's retirement plan.
3. Cashing out and taking a taxable distribution from the plan.
4. Rolling the funds into an IRA rollover account.

Each of these options has advantages and disadvantages and before making a change we encourage you to speak with your CPA and/or tax attorney.

If you are considering rolling over your retirement funds to an IRA for us to manage here are a few points to consider before you do so:

1. Determine whether the investment options in your employer's retirement plan address your needs or whether you might want to consider other types of investments.
 - a. Employer retirement plans generally have a more limited investment menu than IRAs.
 - b. Employer retirement plans may have unique investment options not available to the public such as employer securities, or previously closed funds.
2. Your current plan may have lower fees than our fees.
 - a. If you are interested in investing only in mutual funds, you should understand the cost structure of the share classes available in your employer's retirement plan and how the costs of those share classes compare with those available in an IRA.
 - b. You should understand the various products and services you might take advantage of at an IRA provider and the potential costs of those products and services.
3. Our strategy may have higher risk than the option(s) provided to you in your plan.
4. Your current plan may also offer financial advice.
5. If you keep your assets titled in a 401k or retirement account, you could potentially delay your required minimum distribution beyond age 70.5.
6. Your 401k may offer more liability protection than a rollover IRA; each state may vary.
 - a. Generally, federal law protects assets in qualified plans from creditors. Since 2005, IRA assets have been generally protected from creditors in bankruptcies. However, there can be some exceptions to the general rules so you should consult with an attorney if

- you are concerned about protecting your retirement plan assets from creditors.
7. You may be able to take out a loan on your 401k, but not from an IRA.
 8. IRA assets can be accessed any time; however, distributions are subject to ordinary income tax and may also be subject to a 10% early distribution penalty unless they qualify for an exception such as disability, higher education expenses or the purchase of a home.
 9. If you own company stock in your plan, you may be able to liquidate those shares at a lower capital gains tax rate.
 10. Your plan may allow you to hire us as the manager and keep the assets titled in the plan name.

It is important that you understand the differences between these types of accounts and to decide whether a rollover is best for you. Prior to proceeding, if you have questions contact your investment adviser representative, or call our main number as listed on the cover page of this brochure.

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

IWM does not accept performance based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7 Types of Clients

IWM generally provides investment advice to the following Types of Clients:

- Individuals
- High-Net-Worth Individuals
- Trusts & Estates
- Corporations
- Pension and Profit Sharing Plans
- Defined Benefit and Defined Contribution Plans

Minimum Account Size: There is no account minimum.

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

Our Methods of Analysis and Investment Strategies

IWM has various model portfolios that are used to manage client assets. To determine these models, IWM uses fundamental, cyclical, and technical analysis to determine asset allocations. This information is derived from financial news available (both print and on-line), third-party research that IWM subscribes to, and annual reports issued by companies and investment firms (such as mutual fund companies).

In most cases, IWM is utilizing ETF's, mutual funds and individual stocks in its model portfolios. At times, individual securities can be used to meet client objectives. The strategies used by IWM are long term in nature (held more than a year). At times, short term purchases and sales can occur.

We tend to not chase investment returns, or move capital to "hot" sectors or assets. We focus on long-term results by allocating capital to areas of the market where we perceive the most attractive relative valuations and therefore the greatest potential returns.

Portfolio Construction - Strategic

The firm currently has multiple strategic asset allocations which vary based on risk and return. The mix is determined by the long term historical characteristics of each asset class and is therefore rarely altered. The strategic asset allocation is tailored for each client within appropriate models, based on factors such as risk tolerance, portfolio liquidity needs, and time horizon.

Portfolio Construction - Tactical / Opportunistic

Using the strategic asset allocation as a framework, we then look to tactically deploy capital to asset classes with the most attractive investment prospects. These decisions are based on valuations relative to historic averages and to other asset classes, on our expectations for economic and market conditions, and on business and financial fundamentals.

We believe that both fixed income and equity investing are subject to a number of risks, measurable and otherwise. Some, but not all, of the risks include fluctuations relating to general economic conditions, interest rates, inflation ratios, functioning of the credit markets including liquidity risk, earnings and earnings expectations, political risk including regulations and changes in laws, and currency risks.

Investing in securities does involve risk to principle that clients should be prepared to bear. Clients are encouraged to review the prospectus and reports issued by the investment companies.

Cash Management

For clients with known liquidity needs, we advise setting aside cash or cash equivalents outside of their invested portfolios for the purpose of funding future expenses. We believe that this approach to managing cash reduces the risk of the overall portfolio for clients with liquidity needs. By setting aside cash for near-term expenses, we reduce the likelihood that assets would need to be sold at relatively low valuations in order to generate liquidity, and instead can attempt to proactively raise cash when asset valuations are more attractive.

IWM's methods of analysis include charting analysis, fundamental analysis, technical analysis, and cyclical analysis.

- Charting analysis involves the use of patterns in performance charts. IWM uses technique to search for patterns used to help predict favorable conditions for buying and/or selling a security.
- Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.
- Technical analysis involves the analysis of past market data; primarily price and volume.
- Cyclical analysis involved the analysis of business cycles to find favorable conditions for buying and/or selling a security.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Material Risks Involved

IWM uses Long Term, Short Term Trading, Short Sales and Margin Transactions. IWM utilizes investment strategies that are designed to capture market rates of both return and risk.

Fundamental Analysis - The risk of fundamental analysis is that information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

Charting and Technical Analysis - The risk of market timing based on technical analysis is that charts may not accurately predict future price movements. Current prices of securities may reflect all information known about the security and day to day changes in market prices of securities may follow random patterns and may not be predictable with any reliable degree of accuracy.

Cyclical Analysis - Economic/business cycles may not be predictable and may have many fluctuations between long term expansions and contractions. The lengths of economic cycles may be difficult to predict with accuracy and therefore the risk of cyclical analysis is the difficulty in predicting economic trends and consequently the changing value of securities that would be affected by these changing trends.

We may use short-term trading (in general, selling securities within 30 days of purchasing the same securities) as an investment strategy when managing your account(s). Short-term trading is not a fundamental part of our overall investment strategy, but we may use this strategy occasionally when we determine that it is suitable given your stated investment objectives and tolerance for risk.

We may use investment strategies that involve buying and selling securities frequently in an effort to capture significant market gains and avoid significant losses during a volatile market. However, frequent trading can negatively affect investment performance, particularly through increased brokerage and other transactional costs and taxes.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Risks of Specific Securities Utilized

IWM generally seeks investment strategies that do not involve significant or unusual risk beyond that of the general domestic and/or international equity markets.

As disclosed under the "Advisory Business" section in this Brochure, we primarily offer advice on equity securities, exchange traded funds, mutual funds, corporate debt securities, commercial paper, certificates of deposit, municipal securities, US Government securities, commodities, interest in partnerships investing in real estate and others. Each type of security has its own unique set of risks associated with it and it would not be possible to list here all of the specific risks of every type of investment. Even within the same type of investment, risks can vary widely. However, in very general terms, the higher the anticipated return of an investment, the higher the risk of loss associated with it.

Stocks & Exchange Traded Funds (ETF): There are numerous ways of measuring the risk of equity securities (also known simply as "equities" or "stock"). In very broad terms, the value of a stock depends on the financial health of the company issuing it. However, stock prices can be affected by many other factors including, but not limited to: the class of stock (for example, preferred or common); the health of the market sector of the issuing company; and, the overall health of the economy. In general, larger, more well established companies ("large cap") tend to be safer than smaller start-up companies ("small cap") but the mere size of an issuer is not, by itself, an indicator of the safety of the investment.

Mutual Funds and Exchange Traded Funds: Mutual funds and exchange traded funds are professionally managed collective investment systems that pool money from many investors and invest in stocks, bonds, short-term money market instruments, other mutual funds, other securities or any combination thereof. The fund will have a manager that trades the fund's investments in accordance with the fund's investment objective. While mutual funds and ETFs generally provide diversification, risks can be significantly increased if the fund is concentrated in a particular sector of the market, primarily invests in small cap or speculative companies, uses leverage (i.e., borrows money) to a

significant degree, or concentrates in a particular type of security (i.e., equities) rather than balancing the fund with different types of securities. Exchange traded funds differ from mutual funds since they can be bought and sold throughout the day like stock and their price can fluctuate throughout the day. The returns on mutual funds and ETFs can be reduced by the costs to manage the funds. Also, while some mutual funds are "no load" and charge no fee to buy into, or sell out of, the fund, other types of mutual funds do charge such fees which can also reduce returns. Mutual funds can also be "closed end" or "open end". So-called "open end" mutual funds continue to allow in new investors indefinitely which can dilute other investors' interests.

Corporate Debt Securities: Corporate debt securities (or "bonds") are typically safer investments than equity securities, but their risk can also vary widely based on: the financial health of the issuer; the risk that the issuer might default; when the bond is set to mature; and, whether or not the bond can be "called" prior to maturity. When a bond is called, it may not be possible to replace it with a bond of equal character paying the same rate of return.

Commercial Paper: Commercial Paper (CP) is, in most cases, an unsecured promissory note that is issued with a maturity of 270 days or less. Being unsecured the risk to the investor is that the issuer may default. There is a less risk in asset based commercial paper (ABCP). The difference between ABCP and CP is that instead of being an unsecured promissory note representing an obligation of the issuing company, ABCP is backed by securities. Therefore, the perceived quality of the ABCP depends on the underlying securities.

Certificates of Deposit: Certificates of deposit are generally the safest type of investment since they are insured by the federal government up to a certain amount. However, because the returns are generally very low, it's possible for inflation to outpace the return. Likewise, US Government securities are backed by the full faith and credit of the United States government but it's also possible for the rate of inflation to exceed the returns.

Municipal Securities: Municipal securities, while generally thought of as safe, can have significant risks associated with them including, but not limited to: the credit worthiness of the governmental entity that issues the bond; the stability of the revenue stream that is used to pay the interest to the bondholders; when the bond is due to mature; and, whether or not the bond can be "called" prior to maturity. When a bond is called, it may not be possible to replace it with a bond of equal character paying the same amount of interest or yield to maturity.

Limited Partnership: A limited partnership is a financial affiliation that includes at least one general partner and a number of limited partners. The partnership invests in a venture, such as real estate development or oil exploration, for financial gain. The general partner does not usually invest any capital, but has management authority and unlimited liability. That is, the general partner runs the business and, in the event of bankruptcy, is responsible for all debts not paid or discharged. The limited partners have no management authority and confine their participation to their capital investment. That is, limited partners invest a certain amount of money and have nothing else to do with the business. However, their liability is limited to the amount of the investment. In the worst case scenario for a limited partner, he/she loses what he/she invested. Profits are divided between general and limited partners according to an arrangement formed at the creation of the partnership.

Options: Options give an investor the right to buy or sell a stock at some future time at a set price. Options are complex investments and can be very risky, especially if the investor does not own the underlying stock. In certain situations, an investor's risk can be unlimited. The main difference between warrants and call options is that warrants are issued and guaranteed by the issuing company, whereas options are traded on an exchange and are not issued by the company. Also, the lifetime of a warrant is often measured in years, while the lifetime of a typical option is measured in months.

Private Collective Investment Vehicles: Illumination recommends that certain clients invest in privately placed collective investment vehicles (e.g., private real estate funds, etc.). The managers of these vehicles have broad discretion in selecting the investments. There are few limitations on the types of securities or other financial instruments which may be traded and no requirement to diversify. In addition, because the vehicles are not registered as investment companies, there is an absence of regulation. There are numerous other risks in investing in these securities. Clients should consult each fund's private placement memorandum and/or other documents explaining such risks prior to investing.

Short Sales: Short selling (also known as shorting or going short) is the practice of selling assets, usually securities, that have been borrowed from a third party (usually a broker) with the intention of buying identical assets back at a later date to return to the lender. It is a form of reverse trading. Mathematically, it is equivalent to buying a "negative" amount of the assets. The short seller hopes to profit from a decline in the price of the assets between the sale and the repurchase, as the seller will pay less to buy the assets than the seller received on selling them. Conversely, the short seller will incur a loss if the price of the assets rises. Other costs of shorting may include a fee for borrowing the assets and payment of any dividends paid on the borrowed assets. "Shorting" and "going short" also refer to entering into any derivative or other contract under which the investor profits from a fall in the value of an asset.

Margin: Buying on margin means borrowing money from a broker to purchase stock. Margin trading allows you to buy more stock than you'd be able to normally. An initial investment of at least \$2,000 is required for a margin account, though some brokerages require more. This deposit is known as the minimum margin. Once the account is opened and operational, you can borrow up to 50% of the purchase price of a stock. This portion of the purchase price that you deposit is known as the initial margin. Some brokerages require you to deposit more than 50% of the purchase price. Not all stocks qualify to be bought on margin. When you sell the stock in a margin account, the proceeds go to your broker against the repayment of the loan until it is fully paid. There is also a restriction called the maintenance margin, which is the minimum account balance you must maintain before your broker will force you to deposit more funds or sell stock to pay down your loan. When this happens, it's known as a margin call. If for any reason you do not meet a margin call, the brokerage has the right to sell your securities to increase your account equity until you are above the maintenance margin. Additionally, your broker may not be required to consult you before selling. Under most margin agreements, a firm can sell your securities without waiting for you to meet the margin call and you can't control which stock is sold to cover the margin call. You also have to pay the interest on your loan. The interest charges are applied to your account unless you decide to make payments. Over time, your debt level increases as interest charges accrue against you. As debt increases, the interest charges increase, and so on. Therefore, buying on margin is mainly used for short-term investments. The longer you hold an investment, the greater the return that is needed to break even. In volatile markets, prices can fall very quickly. You can lose more money than you have invested.

Market Risk: The value of the portfolio will move with some level or correlation to the broad US equity market. Stocks in the US equity market move up and down in reaction to changes in: US & Foreign economic conditions, political environments, tax policies, interest rates, exchange rates, investor perception, market liquidity, etc.

Market Cap Risk: The portfolio invests, at times, in small and medium sized companies which, relative to larger companies, historically have shown more volatility and risk in both their business fundamentals and stock price movements.

Interest Rate Risk: Investing in fixed-income / bond fund ETF's carries the risk borne by an interest bearing asset due to the variability of interest rates. In general, as interest rates rise, the price of a fixed-income rate bond will fall, and vice versa.

Concentration Risk: The portfolio is less diversified than the broad US equity market and relevant equity benchmarks. This generates above average volatility and risk.

Management Risk: There is no guarantee that investment decisions by the portfolio manager will produce the desired result and could cause the portfolio to underperform the broad equity market or specific relevant benchmarks.

Tax Considerations

Our strategies and investments may have unique and significant tax implications. However, unless we specifically agree otherwise, and in writing, tax efficiency is not our primary consideration in the management of your assets. Regardless of your account size or any other factors, we strongly recommend that you continuously consult with a tax professional prior to and throughout the investing of your assets.

Moreover, as a result of revised IRS regulations, custodians and broker-dealers will begin reporting the cost basis of equities acquired in client accounts on or after January 1, 2011. Your custodian will default to the FIFO (First-In First-Out) accounting method for calculating the cost basis of your investments. You are responsible for contacting your tax advisor to determine if this accounting method is the right choice for you. If your tax advisor believes another accounting method is more advantageous, please provide written notice to our firm immediately and we will alert your account custodian of your individually selected accounting method. Please note that decisions about cost basis accounting methods will need to be made before trades settle, as the cost basis method cannot be changed after settlement.

Item 9 Disciplinary Information

IWM has been registered and providing investment advisory services since 2009. Neither our firm nor any of our management persons has any reportable disciplinary information.

Item 10 Other Financial Industry Activities and Affiliations

We have not provided information on other financial industry activities and affiliations because we do not have any relationship or arrangement that is material to our advisory business or to our clients with any of the types of entities listed below.

1. broker-dealer, municipal securities dealer, or government securities dealer or broker.
2. investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund).
3. other investment adviser or financial planner.
4. futures commission merchant, commodity pool operator, or commodity trading advisor.
5. banking or thrift institution.
6. accountant or accounting firm.
7. lawyer or law firm.
8. insurance company or agency.
9. pension consultant.
10. real estate broker or dealer.
11. sponsor or syndicator of limited partnerships.

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

Code of Ethics

We strive to comply with applicable laws and regulations governing our practices. Therefore, our Code of Ethics includes guidelines for professional standards of conduct for persons associated with our firm. Our goal is to protect your interests at all times and to demonstrate our commitment to our fiduciary duties of honesty, good faith, and fair dealing with you. All persons associated with our firm are expected to adhere strictly to these guidelines. Persons associated with our firm are also required to report any violations of our Code of Ethics. Additionally, we maintain and enforce written policies reasonably designed to prevent the misuse or dissemination of material, non-public information about you or your account holdings by persons associated with our firm.

Clients or prospective clients may obtain a copy of our Code of Ethics by contacting us at the telephone number on the cover page of this brochure.

Participation or Interest in Client Transactions

Neither our firm nor any persons associated with our firm has any material financial interest in client transactions beyond the provision of investment advisory services as disclosed in this brochure.

Personal Trading Practices

Our firm or persons associated with our firm may buy or sell securities for you at the same time we or persons associated with our firm buy or sell such securities for our own account. We may also combine our orders to purchase securities with your orders to purchase securities ("block trading"). Please refer to the *Brokerage Practices* section in this brochure for information on our block trading practices.

A conflict of interest exists in such cases because we have the ability to trade ahead of you and potentially receive more favorable prices than you will receive. To mitigate this conflict of interest, it is our policy that neither our firm nor persons associated with our firm shall have priority over your account in the purchase or sale of securities.

Item 12 Brokerage Practices

We recommend the brokerage and custodial services of TD Ameritrade, and Charles Schwab (whether one or more "Custodian"). Your assets must be maintained in an account at a "qualified custodian," generally a broker-dealer or bank. In recognition of the value of the services the Custodian provides, you may pay higher commissions and/or trading costs than those that may be available elsewhere.

We seek to recommend a custodian/broker that will hold your assets and execute transactions on terms that are, overall, the most favorable compared to other available providers and their services. We consider various factors, including:

- Capability to buy and sell securities for your account itself or to facilitate such services.
- The likelihood that your trades will be executed.
- Availability of investment research and tools.
- Overall quality of services.
- Competitiveness of price.
- Reputation, financial strength, and stability.
- Existing relationship with our firm and our other clients.

We participate in the TD Ameritrade Institutional program. TD Ameritrade Institutional is a division of TD Ameritrade, Inc. ("TD Ameritrade") member FINRA/SIPC/NFA. TD Ameritrade is an independent and unaffiliated SEC-registered broker-dealer. TD Ameritrade offers to independent investment advisors services which include custody of securities, trade execution, clearance and settlement of transactions. We receive some benefits from TD Ameritrade through our participation in the program.

We participate in TD Ameritrade's institutional customer program and we may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between our participation in the program and the investment advice we give to our Clients, although we receive economic benefits through our participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving our participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to us by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by our related persons. Some of the products and services made available by TD Ameritrade through the program may benefit us but may not benefit our Client accounts. These products or services may assist us in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help us manage and further develop our business enterprise. The benefits received by us or our personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of our fiduciary duties to clients, we endeavor at all times to put the interests of our clients first. Clients should be aware, however, that the receipt of economic benefits by us or our related persons in and of itself creates a potential conflict of interest and may indirectly influence the our choice of TD Ameritrade for custody and brokerage services.

Research and Other Soft Dollar Benefits

IWM receives no research, product, or service other than execution from a broker-dealer or third-party in connection with client securities transactions ("soft dollar benefits").

Brokerage for Client Referrals

IWM receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

Directed Brokerage

IWM will not allow clients to direct IWM to use a specific broker-dealer to execute transactions. Clients must use IWM recommended custodian (broker-dealer). Not all investment advisers require their clients to direct brokerage. By requiring clients to use our specific custodian, IWM may be unable to achieve most favorable execution of client transaction that may cost clients money over using a lower-cost custodian.

Block Trades

IWM maintains the ability to block trade purchases across accounts but will rarely do so. While block trading may benefit clients by purchasing larger blocks in groups, we do not feel that the clients are at a disadvantage due to the best execution practices of our custodian. However, it is possible that clients

may receive different prices for the same securities transactions. Furthermore, clients may not be able to buy or sell the same quantity of securities and may be charged higher fees or commissions, than if transactions were aggregated.

Item 13 Review of Accounts

Financial Life Management Services

A review of the client's financial plan by the client's team occurs both periodically and on an as needed basis. We typically meet with clients anywhere from one to four times per year for an existing client and up to five times per year for a new client. The frequency is determined after a conversation with the client and review of their situation. Our meeting agendas are flexible and change based on the needs of the client and what is most relevant to them at that time. Reports and deliverables are presented in client meetings to help solidify concepts and illustrate key findings. In addition, each client typically receives a post meeting letter summarizing client goals, next steps, and action items.

Investment Advisory Services

In general, each client portfolio is reviewed once every week. Trading is triggered based on deviations from the asset allocation model and is therefore dependent on market conditions. Overall, all clients must be reviewed once every 90 days. The review is performed by Matthew Rinkey. IWM reviews performance of the asset class and funds on a weekly basis and can make a change at any time. Monthly reports provided directly from the custodian to the client.

The securities in every client's account will be monitored on a continuous basis and will be reviewed at least quarterly by Matthew Rinkey, President. Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance). Each client will receive a written, monthly statement from the Custodian detailing the clients account activity. For 401k advisory clients, each client will receive a quarterly report from the Custodian detailing the accounts performance and activity.

Item 14 Client Referrals and Other Compensation

IWM does not receive any economic benefit, directly or indirectly from any third party for advice rendered to IWM clients. In addition, IWM does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

Item 15 Custody

As paying agent for our firm, your independent custodian will directly debit your account(s) for the payment of our advisory fees. This ability to deduct our advisory fees from your accounts causes our firm to exercise limited custody over your funds or securities. We do not have physical custody of any of your funds and/or securities. Your funds and securities will be held with a bank, broker-dealer, or other independent, qualified custodian. You will receive account statements from the independent, qualified custodian(s) holding your funds and securities at least quarterly. The account statements from your custodian(s) will indicate the amount of our advisory fees deducted from your account(s) each billing period. You should carefully review account statements for accuracy. We will also provide statements to you reflecting the amount of advisory fee deducted from your account. You should compare our statements with the statements from your account custodian(s) to reconcile the information reflected on each statement.

If you have a question regarding your account statement or if you did not receive a statement from your custodian, please contact Matthew Rinkey at the telephone number of the cover page of this brochure.

Item 16 Investment Discretion

You may grant our firm discretion over the selection and amount of securities to be purchased or sold for your account(s) without obtaining your consent or approval prior to each transaction. Discretionary authority is typically granted by the investment advisory agreement you sign with our firm or trading authorization forms. You may specify investment objectives, guidelines, and/or impose certain conditions or investment parameters for your account(s). For example, you may specify that the investment in any particular stock or industry should not exceed specified percentages of the value of the portfolio and/or restrictions or prohibitions of transactions in the securities of a specific industry or security. Please refer to the "Advisory Business" section in this brochure for more information on our discretionary management services.

Item 17 Voting Client Securities

We will not vote proxies on behalf of your advisory accounts. We do not offer any advice regarding corporate actions and the exercise of your proxy voting rights. If you own shares of applicable securities, you are responsible for exercising your right to vote as a shareholder.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward any electronic solicitation to vote proxies. If you have a question regarding any solicitation, please contact Matthew Rinkey at the telephone number on the cover page of this brochure.

Item 18 Financial Information

Our firm does not have any financial condition or impairment that would prevent us from meeting our contractual commitments to you. We do not take physical custody of client funds or securities, or serve as trustee or signatory for client accounts, and, we do not require the prepayment of more than \$500 in fees six or more months in advance nor have we filed a bankruptcy petition at any time in the past ten years. Therefore, we are not required to include a financial statement with this brochure.

Item 19 Requirements for State-Registered Advisers

Refer to the Part(s) 2B for background information about management personnel and those giving advice on behalf of our firm.

Neither our firm, nor any persons associated with our firm are compensated for advisory services with performance fees. Please refer to the *Performance-Based Fees and Side-By-Side Management* section above for additional information on this topic.

Neither our firm, nor any of our management persons have any reportable arbitration claims, civil, self-regulatory organization proceedings or administrative proceedings.

Neither our firm, nor any of our management persons have a material relationship or arrangement with any issuer of securities.

Item 20 Additional Information

Your Privacy

We view protecting your private information as a top priority. Pursuant to applicable privacy requirements, we have instituted policies and procedures to ensure that we keep your personal information private and secure.

We do not disclose any nonpublic personal information about you to any nonaffiliated third parties, except as permitted by law. In the course of servicing your account, we may share some information with our service providers, such as transfer agents, custodians, broker-dealers, accountants, consultants, and attorneys.

We restrict internal access to nonpublic personal information about you to employees, who need that information in order to provide products or services to you. We maintain physical and procedural safeguards that comply with regulatory standards to guard your nonpublic personal information and to ensure our integrity and confidentiality. We will not sell information about you or your accounts to anyone. We do not share your information unless it is required to process a transaction, at your request, or required by law.

You will receive a copy of our privacy notice prior to or at the time you sign an advisory agreement with our firm. Thereafter, we will deliver a copy of the current privacy policy notice to you on an annual basis. Please contact our main office at the telephone number on the cover page of this brochure if you have any questions regarding this policy.

Trade Errors

In the event a trading error occurs in your account, our policy is to restore your account to the position it should have been in had the trading error not occurred. Depending on the circumstances, corrective actions may include canceling the trade, adjusting an allocation, and/or reimbursing the account. If a trade error results in a profit, you will keep the profit.

Class Action Lawsuits

We do not determine if securities held by you are the subject of a class action lawsuit or whether you are eligible to participate in class action settlements or litigation nor do we initiate or participate in litigation to recover damages on your behalf for injuries as a result of actions, misconduct, or negligence by issuers of securities held by you.

Matthew Rinkey

Illumination Wealth Management

**4320 La Jolla Village Drive
Suite 210
San Diego, CA 92122**

**Telephone: 858-246-6855
Facsimile: 858-766-5529**

matt@illuminationwealth.com

April 22, 2020

FORM ADV PART 2B BROCHURE SUPPLEMENT

This brochure supplement provides information about Matthew Rinkey that supplements the Illumination Wealth Management brochure. You should have received a copy of that brochure. Please contact us at 858-246-6855 if you did not receive Illumination Wealth Management's brochure or if you have any questions about the contents of this supplement.

Additional information about Matthew Rinkey is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Educational Background and Business Experience

Matthew Rinkey

Year of Birth: 1980

Education:

- University of Wisconsin - Madison School of Business, B.B.A. Finance, Investments and Banking, 9/1998 - 5/2002

Business Background:

- Rinkey Investments (fka MR Capital Corp) d/b/a Illumination Wealth Management , President, 1/2008 - Present
- Ben Rinkey and Associates, LLC, Investment Adviser Representative, 01/2015 - 11/2016
- Millenco, Senior Analyst, 5/2007 - 10/2008
- JD Anderson Capital, LLC, Senior Analyst, 5/2007 - 10/2008
- Kellogg Capital Group, Analyst, 11/2003 - 03/2007

Item 3 Disciplinary Information

Form ADV Part 2B requires disclosure of certain criminal or civil actions, administrative proceedings, and self-regulatory organization proceedings, as well as certain other proceedings related to suspension or revocation of a professional attainment, designation, or license. Mr. Matthew Rinkey has no required disclosures under this item.

Item 4 Other Business Activities

Matthew Rinkey is not actively engaged in any other business or occupation (investment-related or otherwise) beyond his capacity as President of Rinkey Investments. Moreover, Mr. Rinkey does not receive any commissions, bonuses or other compensation based on the sale of securities or other investment products.

Item 5 Additional Compensation

Matthew Rinkey does not receive any additional compensation beyond that received as an President of Rinkey Investments.

Item 6 Supervision

As the only owner and representative of Illumination Wealth Management, Matthew Seth Rinkey supervises all duties and activities. Matthew Seth Rinkey's contact information is on the cover page of this disclosure document.

Item 7 Requirements for State Registered Advisers

Matthew Rinkey does not have, or has ever had, any reportable arbitration claims, has not been found liable in a reportable civil, self-regulatory organization or administrative proceeding, and has not been the subject of a bankruptcy petition.

Benjamin Rinkey
2900 Thomas Av So. # 1929
Minneapolis, MN 55416

Telephone: 612-750-5903

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April 22, 2020

FORM ADV PART 2B **BROCHURE SUPPLEMENT**

This brochure supplement provides information about Benjamin Rinkey that supplements the Rinkey Investments brochure. You should have received a copy of that brochure. Contact us at 858-246-6855 if you did not receive Rinkey Investments's brochure or if you have any questions about the contents of this supplement.

Additional information about Benjamin Rinkey (CRD # 377023) is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Educational Background and Business Experience

Benjamin Rinkey

Year of Birth: 1941

Education:

- University of Minnesota, B.A. 1969

Business Background:

- Rinkey and Associates, LLC, d/b/a Illumination Wealth Management, Investment Adviser Representative, 04/2014 to Present
- Ben Rinkey & Associates, LLP, CEO, 2/2013 to 11/2016
- GlobalBridge, Inc., CEO, 01/2012 to 02/2013
- Retired, 01/2003 to 01/2012
- Dougherty & Company, LLC, Fixed Income Consultant, 06/2002 to 12/2003

Item 3 Disciplinary Information

Form ADV Part 2B requires disclosure of certain criminal or civil actions, administrative proceedings, and self-regulatory organization proceedings, as well as certain other proceedings related to suspension or revocation of a professional attainment, designation, or license. Mr. Benjamin Rinkey has no required disclosures under this item.

Item 4 Other Business Activities

Benjamin Rinkey is not actively engaged in any other business or occupation (investment-related or otherwise) beyond his capacity as Portfolio Manager of Rinkey Investments. Moreover, Mr. Rinkey does not receive any commissions, bonuses or other compensation based on the sale of securities or other investment products.

Item 5 Additional Compensation

Benjamin Rinkey does not receive any additional compensation beyond that received as an Portfolio Manager of Rinkey Investments.

Item 6 Supervision

Matthew Rinkey, President of Illumination Wealth Management is responsible for supervising the activities of Mr. Benjamin Rinkey. Matthew Rinkey can be reached at 858-246-6855.

Item 7 Requirements for State Registered Advisers

We are required to disclose the facts of certain legal or disciplinary events that are material to a client's evaluation of our advisory business or the integrity of our management including certain arbitration claims, civil, self-regulatory organization or administrative proceedings, and bankruptcy petitions. We do not have any required disclosures under this item.

Norman Mangina, CFP®

Rinkey Investments

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April 22, 2020

**FORM ADV PART 2B
BROCHURE SUPPLEMENT**

This brochure supplement provides information about Norman Mangina that supplements the Rinkey Investments brochure. You should have received a copy of that brochure. Contact us at 858-246-6855 if you did not receive Rinkey Investments's brochure or if you have any questions about the contents of this supplement.

Additional information about Norman Mangina (CRD # 6542379) is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Educational Background and Business Experience

Norman Mangina

Year of Birth: 1974

Formal Education After High School:

- University of Georgia, MS Accounting, 8/1995 - 8/1996
- University of Georgia, BS Accounting, 9/1992 - 6/1995

Business Background:

- Illumination Wealth Management, Senior Financial Planner, 7/2018 - Present
- Illumination Wealth Management, Associate Financial Planner, 7/2015 - 07/2018
- CareerBuilder, LLC, Director of Financial Operations, 5/2005 - 1/2015

Certifications: CFP

The 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. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

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 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 financial planning-related experience (or the equivalent, measured as 2,000 hours per year); 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.

Item 3 Disciplinary Information

Form ADV Part 2B requires disclosure of certain criminal or civil actions, administrative proceedings, and self-regulatory organization proceedings, as well as certain other proceedings related to suspension or revocation of a professional attainment, designation, or license. Mr. Norman Mangina has no required disclosures under this item.

Item 4 Other Business Activities

Norman Mangina is not actively engaged in any other business or occupation (investment-related or otherwise) beyond his capacity as Associate Financial Planner of Illumination Wealth Management. Moreover, Mr. Mangina does not receive any commissions, bonuses or other compensation based on the sale of securities or other investment products.

Item 5 Additional Compensation

Norman Mangina does not receive any additional compensation beyond that received as an Associate Financial Planner of Illumination Wealth Management.

Item 6 Supervision

In the supervision of our associated persons, advice provided is limited based on the restrictions set by Illumination Wealth Management, and by internal decisions as to the types of investments that may be included in client portfolios. We conduct periodic reviews of client holdings and documented suitability information to provide reasonable assurance that the advice provided remains aligned with each client's stated investment objectives and with our internal guidelines.

My supervisor is: Matt Rinkey, President

Supervisor phone number: 858-246-6855

Item 7 Requirements for State Registered Advisers

Norman Mangina does not have any reportable arbitration claims, has not been found liable in a reportable civil, self-regulatory organization or administrative proceeding, and has not been the subject of a bankruptcy petition.

Kathleen Brittany Boyd

Rinkey Investments

**4320 La Jolla Village Drive
Suite 210
San Diego, CA 92122**

**Telephone: 858-246-6855
Facsimile: 858-766-5529**

April 22, 2020

**FORM ADV PART 2B
BROCHURE SUPPLEMENT**

This brochure supplement provides information about Kathleen Brittany Boyd that supplements the Rinkey Investments brochure. You should have received a copy of that brochure. Contact us at 858-246-6855 if you did not receive Rinkey Investments's brochure or if you have any questions about the contents of this supplement.

Additional information about Kathleen Brittany Boyd (CRD # 6608573) is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Educational Background and Business Experience

Kathleen Brittany Boyd

Year of Birth: 1985

Formal Education After High School:

- Kansas State University, Institute of Personal Financial Planning, Master of Science: Financial Planning & Therapy, 8/2016 - 5/2019
- University of Utah, David Eccles School of Business, Master of Science: Finance, 8/2011 - 5/2013
- University of Utah, College of Social Behavior & Science, Bachelor of Science: Economics, Minor: Business, 8/2009 - 5/2011

Business Background:

- Rinkey Investments, Investment Adviser Representative, 8/2019 - Present
- Kansas State University, Instructor, 1/2019 - 5/2019
- Brunch and Budget, LLC, Investment Adviser Representative, 1/2019 - 1/2019
- Navigoe, LLC, Wealth Advisor, 9/2017 - 10/2018
- Inspired Financial, Intern, 5/2017 - 8/2017
- Cetera Advisor Networks, LLC, Regulatory Administration, 3/2016 - 7/2016
- Erman Retirement Advisory, Client Services Manager, 1/2016 - 7/2016
- Wells Fargo Private Bank, Investment Professional, 8/2013 - 12/2015

Item 3 Disciplinary Information

Form ADV Part 2B requires disclosure of certain criminal or civil actions, administrative proceedings, and self-regulatory organization proceedings, as well as certain other proceedings related to suspension or revocation of a professional attainment, designation, or license. Ms. Kathleen Brittany Boyd has no required disclosures under this item.

Item 4 Other Business Activities

Kathleen Brittany Boyd is a Writer/Contributor for Forbes.com and Kitces.com, both publishers of personal finance content. Ms. Boyd's duties as a Writer/Contributor for Forbes.com and Kitces.com do not create a conflict of interest to her provision of advisory services through Rinkey Investments.

Item 5 Additional Compensation

Refer to the *Other Business Activities* section above for disclosures on Ms. Boyd's receipt of additional compensation as a result of her other business activities.

Also, refer to the *Fees and Compensation, Client Referrals and Other Compensation, and Other Financial Industry Activities and Affiliations* section(s) of Rinkey Investments's firm brochure for additional disclosures on this topic.

Item 6 Supervision

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My supervisor is: Matt Rinkey, President

Supervisor phone number: 858-246-6855

Item 7 Requirements for State Registered Advisers

Kathleen Brittany Boyd does not have any reportable arbitration claims, has not been found liable in a reportable civil, self-regulatory organization or administrative proceeding, and has not been the subject of a bankruptcy petition.

Eric Niergarth, CFP®

Illumination Wealth Management

**4320 La Jolla Village Drive
Suite 210
San Diego, CA 92122**

**Telephone: 858-246-6855
Facsimile: 858-766-5529**

eric@illuminationwealth.com

April 22, 2020

**FORM ADV PART 2B
BROCHURE SUPPLEMENT**

This brochure supplement provides information about Eric Niergarth that supplements the Illumination Wealth Management brochure. You should have received a copy of that brochure. Contact us at 858-246-6855 if you did not receive Illumination Wealth Management's brochure or if you have any questions about the contents of this supplement.

Additional information about Eric Niergarth (CRD # 5548793) is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Educational Background and Business Experience

Eric Niergarth, CFP®

Year of Birth: 1987

Formal Education After High School:

- Arizona State University, W.P. Carey School of Business, Bachelor of Science in Accountancy, 2009

Business Background:

- Rinkey Investments d/b/a Illumination Wealth Management, Associate Financial Planner, 4/2020 - Present
- LPL Financial, LLC, Associate Financial Planner, 8/2019 - 3/2020
- The Gensler Group, Administrative Associate, 7/2019 - 3/2020
- TD Ameritrade, Inc., Relationship Manager, 7/2009 - 7/2019

Certifications: CFP®

The 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. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

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

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- 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.

Item 3 Disciplinary Information

Form ADV Part 2B requires disclosure of certain criminal or civil actions, administrative proceedings, and self-regulatory organization proceedings, as well as certain other proceedings related to suspension or revocation of a professional attainment, designation, or license. Mr. Eric Niergarth has no required disclosures under this item.

Item 4 Other Business Activities

Eric Niergarth is not actively engaged in any other business or occupation (investment-related or otherwise) beyond his capacity as Associate Financial Planner of Illumination Wealth Management. Moreover, Mr. Niergarth does not receive any commissions, bonuses or other compensation based on the sale of securities or other investment products.

Item 5 Additional Compensation

Mr. Niergarth does not receive any additional compensation beyond that received as an Associate Financial Planner of Illumination Wealth Management.

Item 6 Supervision

In the supervision of our associated persons, advice provided is limited based on the restrictions set by Illumination Wealth Management, and by internal decisions as to the types of investments that may be included in client portfolios. We conduct periodic reviews of client holdings and documented suitability information to provide reasonable assurance that the advice provided remains aligned with each client's stated investment objectives and with our internal guidelines.

My supervisor is: Matt Rinkey, President

Supervisor phone number: 858-246-6855

Item 7 Requirements for State Registered Advisers

Eric Niergarth does not have any reportable arbitration claims, has not been found liable in a reportable civil, self-regulatory organization or administrative proceeding, and has not been the subject of a bankruptcy petition.