



Form ADV Part 3 – Customer Relationship Summary

Adopted June 30, 2020

Item 1 – Introduction

McGinn Penninger Investment Management, Inc. (McGinn) is a Securities and Exchange Commission (SEC) regulated Investment Advisor and has been in business since 1992. McGinn is also a sub-advisor to the SEC registered Union Street Partners Value Fund (Symbols: USPFX, USPVX and USPCX). McGinn is not a broker-dealer.

Brokerage, investment advisory and mutual fund services and fees differ, and it is important for retail investors to understand the differences. Free and simple tools are available to research firms and financial professionals at www.Investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisors and investing.

Item 2 – Relationships and Services

McGinn offers investment advisory services to institutional and retail investors. We are a “money manager” utilizing a large-cap, value-oriented investment strategy, which is implemented using equity securities and open-end mutual funds. McGinn also offers a fixed income strategy for clients with a specific need for a more income producing portfolio. McGinn does not provide legal, accounting, insurance or retirement and estate planning advice.

McGinn has discretionary authority to manage your account which means we make decisions on securities to buy or sell in your account, without first seeking your approval. We continually monitor your account to be sure it conforms to the McGinn investment strategy and your individual, financial needs. We do not have a minimum account size requirement however, we use our discretion to determine if your account would be best suited as a separately managed account with individual equity positions or invested into the Union Street Partners Value Fund that we sub-advise. We do not have custody of the funds in your account. The funds in your account are held at your account custodian (Charles Schwab, for example), similarly to your bank holding the funds in your checking or savings account.

Additional Information: Please refer to our ADV Part 2A (available at www.mcgininvests.com or by request) for more detailed information.

Conversation Starters: Below are some questions you might want to ask any financial professional to start a discussion about the services they provide to you.

- *Given my financial situation, should I choose an investment advisory service? Why or why not?*
- *How will you choose investments for my account?*
- *What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?*

Item 3 – Fees, Costs, Conflicts and Standard of Conduct

McGinn charges you an advisory fee (we might also refer to it as a management fee) to manage your account. This fee is based on the value of your account and is billed quarterly. The more assets you have in your account, including cash, the more you will pay. We do not receive any other compensation in association with managing your account. You pay our fee no matter how few, or how many, trades we execute in your account. In addition to our fee, you may pay fees to your account custodian/broker-dealer, such as wire or transaction fees.

You may also pay product-level fees. If any portion of your account is invested in shares of mutual funds, exchange traded funds, or other investment companies (“funds”), you will pay additional fees and expenses, which are described in the prospectuses of those funds and paid by the funds, but ultimately borne by you. Examples of such fees are management fees, and distribution fees. McGinn serves as a sub-adviser to the previously mentioned Union Street Partners Value Fund (USPFX, USP VX and USPCX) Should we decide to invest any portion of your account in the Union Street Partners Value Fund we manage, we will exclude that portion of your account from the value used to calculate your quarterly McGinn management fee.

Additional Information: You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments, over time. Please make sure you understand what fees and costs you are paying. Please refer the McGinn ADV Part 2A for more information on the fee you pay us.

Conversation Starter: Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?

[What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?](#)

When we act as your investment adviser, we act in your best interest and do not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts, because they can affect the investment advice we provide you. Here is an example to help you understand what this means: The more assets you have in your account, the more you will pay us to manage it. While it is not our practice, this creates an incentive to encourage an investor to increase the assets in his/her account.

Conversation Starter: How might your conflicts of interest affect me, and how will you address them?

[How do your financial professionals make money?](#)

Our financial professionals are compensated based on the profitability of McGinn. They do not receive commissions on trades in your account or payments from a third party, related to investments in your account. McGinn financial professionals do not receive non-cash compensation.

Item 4 – Disciplinary History

As a firm, McGinn does not have any legal or disciplinary history to report and none of our financial professionals have any legal or disciplinary history to report, while working with McGinn. Please visit www.investor.gov/CRS for a free and simple search tool to research any financial professionals.

Conversation Starter: As a financial professional, do you have any disciplinary history? For what type of conduct?

Item 5 – Additional Information

For additional information about our investment advisory services, please visit www.Investor.gov/CRS, the SEC’s website at www.adviserinfo.sec.gov, or our website at www.mcginninvests.com . To contact us with questions or to request up-to-date information, a copy of this relationship summary, or our ADV Part 2A, please call 703.548.2555 or email mcginnteam@mcginninvests.com .

Conversation Starter: Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?