

## Item 1 – Cover Page

# DELUCA

## FINANCIAL PLANNING

### **DeLuca Financial Planning, LLC**

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### **Form ADV Part 2A – Firm Brochure**

Dated: April 09, 2026

This brochure provides information about the qualifications and business practices of DeLuca Financial Planning, LLC. If you have any questions about the contents of this brochure, please contact us at 610-202-4033 and/or [Tom@DeLucaPlans.com](mailto:Tom@DeLucaPlans.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

DeLuca Financial Planning, LLC is a registered investment adviser in the Commonwealth of Pennsylvania. Registration as an investment adviser does not imply a certain level of skill or training.

Additional information about DeLuca Financial Planning, LLC also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov), which can be found using the firm's CRD number, 340286.

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## Item 2 – Material Changes

This brochure was updated to correct administrative language and to reflect branding updates. There have been no material changes to the firm’s advisory services, fees, or business practices.

In the future, any material changes will be described in this section and communicated to clients as required.

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## Item 4 – Advisory Business

### Description of Advisory Firm

DeLuca Financial Planning, LLC (“DFP”) is a fee-only investment advisory firm located in the Commonwealth of Pennsylvania. The firm is organized as a limited liability company formed in December of 2025. DFP became registered as an investment adviser in the Commonwealth of Pennsylvania in 2026.

Thomas J. DeLuca is the Founder and Principal Adviser as well as the firm’s Chief Compliance Officer (“CCO”). DeLuca Financial Planning, LLC currently operates as a solo advisory practice. The firm does not provide advisory services to registered investment companies or pooled investment vehicles.

As used in this brochure, the words “DeLuca Financial Planning”, “DFP”, “we”, “our firm”, “Advisor”, and “us” refer to DeLuca Financial Planning, LLC and the words “you”, “your”, and “Client” refer to you as either a client or prospective client of the firm.

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### Types of Advisory Services

DFP provides financial planning and investment advisory services primarily to individuals, families, and small business owners. DFP is a fee-only firm, meaning the only compensation we receive is from our clients for our services.

From time to time, DFP recommends third-party professionals such as attorneys, accountants, tax advisors, insurance agents, or other financial professionals to assist clients in implementing elements of their financial plans. The firm is not affiliated with, and does not receive compensation from, third-party professionals it may recommend.

The core service provided by DeLuca Financial Planning is personalized financial planning designed to address a client’s overall financial situation. Financial planning engagements involve working collaboratively with clients to identify goals, priorities, and values related to money and to develop strategies intended to support those goals over time.

Financial planning analysis and recommendations may include areas such as:

- retirement planning
- tax-aware planning strategies (excluding tax preparation or legal advice)
- cash-flow and savings planning
- investment planning and asset allocation guidance

- education funding analysis
- insurance and risk management review
- estate and legacy planning coordination
- financial decision support through scenario modeling

These financial planning services may be delivered through project-based financial planning engagements, ongoing financial planning relationships, or as part of a broader investment advisory relationship, depending on the scope of services requested by the client.

The following sections describe these engagement structures in greater detail.

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### **Project-Based Financial Planning**

DeLuca Financial Planning may provide project-based financial planning services designed to address specific financial questions, decisions, or planning needs. These engagements are typically limited in duration and are structured to provide analysis and recommendations related to a defined financial planning matter or set of issues.

In some cases, a project-based engagement may involve a comprehensive review of a client's financial situation and the development of a financial plan, but without an ongoing advisory or implementation relationship after the planning engagement is completed.

Examples of project-based financial planning topics may include retirement readiness analysis, tax-aware planning strategies (excluding tax preparation or legal advice), education funding analysis, insurance review, cash-flow analysis, investment allocation guidance, or other specific financial planning questions.

The scope of services, deliverables, time horizon, and fees for project-based engagements are defined in writing and agreed upon with the client prior to the commencement of services.

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### **Ongoing Financial Planning**

DeLuca Financial Planning also offers ongoing financial planning relationships for clients seeking continued advisory support. These engagements involve working with clients over time to develop, implement, and update financial planning strategies designed to address their overall financial situation.

Ongoing financial planning may include analysis and guidance in areas such as retirement planning, tax-aware planning strategies (excluding tax preparation or legal advice), cash flow and savings strategies, investment planning and asset allocation guidance, education funding analysis, risk management and insurance review, estate and legacy planning coordination, and financial decision support through scenario modeling.

Clients engaging in ongoing financial planning will be asked to provide relevant personal and financial information necessary to complete the agreed-upon scope of analysis. Recommendations are tailored to the client's circumstances and are reviewed and updated periodically as goals, financial conditions, and life circumstances evolve.

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### **Investment Advisory Services**

For clients who elect investment advisory services, DeLuca Financial Planning provides portfolio design and ongoing investment guidance based on the client's financial plan, objectives, and risk tolerance. Investment advisory services may include portfolio allocation design and ongoing investment guidance using a core portfolio of diversified, low-cost investment vehicles, with the potential inclusion of other investment types where appropriate based on a client's objectives, risk tolerance, time horizon, tax considerations, and preferences. Additional services may include periodic portfolio review, rebalancing guidance, and coordination with third-party custodians and investment platforms.

Investment advisory services are provided on a non-discretionary basis. This means the firm provides investment recommendations to clients, but client approval is required prior to the execution of any transactions. The firm will not place trades in a client account without the client's prior authorization for each recommended transaction. Client approvals may be provided in writing, electronically, or verbally and will be documented by the firm. All terms and authority are described in the client advisory agreement. The firm does not exercise trading discretion over client accounts.

Client assets are held at an independent qualified custodian and not with the firm (Charles Schwab & Co., Inc.). The firm does not take physical custody of client assets.

Fees associated with investment advisory services are described in Item 5 of this brochure.

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## **Client Tailored Services and Restrictions**

While DeLuca Financial Planning offers a consistent suite of advisory services, each client's financial plan, investment strategy, and implementation are tailored to the client's individual circumstances, objectives, and constraints. Clients may impose reasonable restrictions on investing in certain securities, asset classes, or industry sectors, subject to the firm's ability to effectively manage the account within those limitations.

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## **Wrap Fee Programs**

DeLuca Financial Planning does not participate in wrap fee programs.

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## **Item 5 – Fees and Compensation**

DeLuca Financial Planning, LLC (“DFP”) is compensated solely by fees paid directly by its clients. The firm does not receive commissions, product-based compensation, revenue sharing, referral fees, or other forms of third-party compensation. As a fee-only adviser, the firm does not sell investment products and does not receive compensation based on the sale of securities or financial products.

Investment management fees are charged as a percentage of assets under management and are billed quarterly in arrears based on the value of client accounts as of the last business day of each calendar quarter. Financial planning fees may be charged as a fixed or recurring fee and may be billed monthly or quarterly as described in the advisory agreement.

Clients may elect to pay planning fees via ACH, check, or electronic payment processor. Clients electing to pay via credit card or other electronic payment processor may incur additional processing fees charged by the payment provider. These fees are not compensation to the Advisor.

Unless a client has received this Disclosure Brochure at least 48 hours prior to entering into an advisory agreement, the client may terminate the advisory agreement within five (5) business days of signing without incurring advisory fees or penalties.

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## **Financial Planning Fees**

DeLuca Financial Planning offers financial planning services either as project-based financial planning engagements, ongoing financial planning relationships, or as part of an investment advisory relationship.

Project-based financial planning engagements are designed to address specific planning questions, financial topics, or defined planning projects. Ongoing financial planning relationships involve continued engagement with the client to review, update, and implement financial planning recommendations over time. Investment advisory relationships include ongoing financial planning services provided as part of the advisory relationship, unless otherwise agreed upon in writing.

Financial planning fees may be structured as fixed fees, hourly fees, recurring subscription or retainer-based fees depending on the scope of services provided. Investment advisory fees are billed as a percentage of assets under management.

The following sections describe these fee structures in greater detail.

### **Project-Based Financial Planning**

Project-based financial planning engagements generally range from \$750 to \$10,000, depending on the scope, complexity, and deliverables involved in the engagement.

Certain limited-scope planning engagements that focus on a specific topic or question are generally priced toward the lower end of this range.

Where appropriate, project-based planning services may also be billed on an hourly basis. Hourly financial planning services, where offered, are billed at \$350 per hour.

### **Ongoing Financial Planning**

Ongoing financial planning services for clients who are not engaged under an asset-based advisory arrangement generally range from \$3,000 to \$12,000 annually, depending on the complexity of the client's financial circumstances and the scope of services provided.

Ongoing planning fees may be billed monthly or quarterly as specified in the client advisory agreement.

### **Fee Determination**

Fees vary based on factors including:

- the complexity of the client's financial situation
- scope of services requested

- planning needs and analysis required
- number of accounts and financial relationships involved
- coordination with other professionals
- business ownership or advanced planning considerations

All fees are negotiable in certain circumstances. The specific fee structure, billing frequency, and scope of services are disclosed in the client’s written advisory agreement and agreed upon in advance.

The firm does not require prepayment of fees more than six months in advance in excess of \$500 per client.

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### **Investment Advisory (Asset-Based) Fees**

For clients who engage DeLuca Financial Planning, LLC for ongoing investment advisory services, fees are charged as a percentage of assets under management (“AUM”). Investment advisory fees are generally billed quarterly in arrears and are calculated based on the value of assets under management as of the last business day of each calendar quarter.

Investment advisory fees typically include ongoing financial planning services provided as part of the advisory relationship, unless otherwise agreed upon in writing.

The firm’s asset-based advisory fee schedule is as follows:

#### **Assets Under Management Annual Fee**

First \$2,000,000	1.00%
Next \$3,000,000	0.75%
Over \$5,000,000	0.50%

Fees are assessed on a tiered basis, meaning that different portions of a client’s portfolio are charged at different rates.

While the firm does not impose a minimum asset level for investment advisory services, a minimum annual advisory fee of \$6,000 generally applies. This minimum is typically billed as \$1,500 per quarter. The minimum fee may be waived or reduced at the firm’s discretion

based on client circumstances, service scope, and overall advisory relationship. Fees are negotiable.

Accounts initiated or terminated during a billing period may be charged a prorated fee based on the number of days the account was under management during the billing period.

Advisory fees may be directly debited from client accounts held at a qualified, unaffiliated custodian, provided the client has granted written authorization. The qualified custodian provides account statements directly to clients, and clients are encouraged to review those statements and compare them to invoices provided by the firm.

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### **Termination of Advisory Services**

Either the Client or DeLuca Financial Planning may terminate an advisory relationship in accordance with the terms of the client advisory agreement. Unless otherwise agreed in writing, either party may terminate the advisory relationship upon thirty (30) days' written notice to the other party.

Project-based financial planning engagements generally terminate upon completion of the agreed-upon services and payment of all applicable fees, unless terminated earlier in accordance with the advisory agreement.

For ongoing financial planning or investment advisory relationships, fees are typically billed in arrears. If services are terminated during a billing period, fees will be prorated based on the number of days services were provided during the applicable billing period.

For project-based financial planning engagements terminated prior to completion, the firm may retain fees corresponding to services already rendered or work completed. Any unearned prepaid fees, if applicable, will be refunded promptly.

Additional details regarding termination and fee adjustments are described in the client advisory agreement.

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### **Initial Planning Services and Early Termination**

For clients who engage the firm for investment advisory services or ongoing financial planning, the advisory relationship typically includes the development of an initial financial plan or planning analysis at the outset of the engagement.

If a client terminates an advisory or ongoing financial planning relationship within the first year, the firm may charge a separate fee for the initial financial planning services provided.

Any such planning fee will be disclosed and agreed upon in writing in advance, will be offset by any advisory fees already paid, will be reasonable and will not exceed the value of services delivered. Fees are negotiable.

This provision applies only in the event of client-initiated termination.

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### **Fee Changes**

No increase in advisory fees will be effective without prior notice to the client and written agreement, as required by the client advisory agreement.

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### **Additional Fees and Expenses**

Advisory fees charged by DeLuca Financial Planning are exclusive of brokerage commissions, transaction fees, custodial fees, and other related costs and expenses that may be incurred by clients. Clients may incur certain charges imposed by custodians, brokers, or other third parties, including custodial fees, transaction charges, wire transfer fees, electronic fund fees, and internal management fees associated with mutual funds or exchange-traded funds.

Such charges, fees, and expenses are separate from and in addition to the firm's advisory fees. The firm does not receive any portion of these third-party fees or expenses.

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### **Other Compensation**

DeLuca Financial Planning does not accept compensation for the sale of securities or other investment products and does not receive asset-based sales charges, service fees, or commissions from the sale of mutual funds or other securities.

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## Item 6 – Performance-Based Fees and Side-by-Side Management

The firm does not charge performance-based fees and does not engage in side-by-side management.

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## Item 7 – Types of Clients

DeLuca Financial Planning, LLC primarily provides advisory services to individuals and families. The firm may serve mass-affluent and high-net-worth households, professionals, small business owners, pre-retirees, retirees, and mid-career accumulators seeking comprehensive financial planning and investment advisory services.

In certain circumstances, the firm may also provide advisory services to closely held businesses and charitable organizations where such services are consistent with the firm's planning-led advisory model and expertise.

The firm does not impose a firm-wide minimum account size. However, certain services may be more suitable for clients meeting specific asset levels, planning complexity, or engagement scope considerations, which are evaluated on a case-by-case basis.

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

### **Methods of Analysis and Investment Philosophy**

DeLuca Financial Planning, LLC employs a planning-driven, long-term investment philosophy that emphasizes diversification, disciplined portfolio construction, and alignment with each client's financial goals, risk tolerance, and time horizon. Investment recommendations are made within the context of a client's overall financial plan and are intended to support long-term objectives rather than short-term market outcomes.

The firm's analysis generally focuses on portfolio-level decision-making, recognizing that asset allocation and diversification typically have a greater impact on long-term results than the selection of individual securities. Portfolios are designed using a core allocation of diversified investment vehicles, with additional investments incorporated where appropriate based on a client's objectives, preferences, tax considerations, and overall planning needs.

Methods of analysis used by the firm include asset allocation analysis, fundamental and qualitative review of investment options, assessment of client risk tolerance and time horizon, and scenario or assumption-based financial modeling. These tools are used to evaluate how different investment approaches may perform under varying market conditions and life circumstances. The firm relies primarily on publicly available information, fund and manager materials, third-party research, and planning-based modeling tools. The firm does not rely on technical trading systems, short-term market timing, or proprietary trading models.

The firm does not guarantee investment results and does not represent that any investment strategy or recommendation will be successful.

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### **Investment Strategies**

Investment strategies are tailored to each client and may vary depending on factors such as financial goals, income needs, tax considerations, time horizon, and behavioral preferences. The firm generally favors diversified, long-term investment strategies and may utilize a combination of passive and actively managed investment vehicles consistent with the client's financial plan.

Portfolios are most commonly constructed using diversified, low-cost exchange-traded funds (ETFs) and mutual funds. ETF-based portfolios are typically used for clients who prefer a passive investment approach. Mutual funds and other professionally managed investment vehicles may be used where active management exposure is desired or where appropriate for portfolio construction or tax considerations. The specific investments used will vary based on client circumstances and account requirements.

In certain circumstances, and at client direction or with client approval, limited allocations to individual stocks or other securities may be incorporated. Such allocations are generally supplemental and are not typically used as the primary portfolio strategy.

Portfolio strategies generally emphasize diversification, periodic rebalancing, cost awareness, and tax sensitivity where appropriate. Because the firm provides services on a non-discretionary basis, investment transactions are implemented only after client approval.

While the firm seeks to manage risk through diversification and disciplined portfolio management, all investment strategies involve the risk of loss and may result in periods of underperformance or declines in portfolio value.

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## **Material Risks Involved**

All investing involves risk, including the potential loss of principal. Clients should be prepared to bear investment losses, including the possibility that an account may lose value over time. Material risks associated with the firm's investment strategies may include, but are not limited to, the following:

**Market Risk** — The risk that the value of investments may decline due to overall market conditions, economic events, or changes in investor sentiment.

**Sequence-of>Returns Risk** — The risk that the timing of investment returns, particularly early in retirement or during periods of withdrawals, may negatively impact long-term portfolio sustainability.

**Inflation Risk** — The risk that rising prices may erode the purchasing power of investment assets over time.

**Interest Rate Risk** — The risk that changes in interest rates may negatively affect the value of fixed-income investments and other interest-sensitive assets.

**Concentration Risk** — The risk that a portfolio focused in certain asset classes, sectors, or investment types may experience greater volatility than a more broadly diversified portfolio.

**Liquidity Risk** — The risk that certain investments may be difficult to buy or sell at desired prices under certain market conditions.

**Behavioral Risk** — The risk that emotional or behavioral decisions by clients may negatively affect investment outcomes.

**Model and Assumption Risk** — The risk that financial planning models, assumptions, or projections may differ materially from actual future results.

**Fund and Manager Risk** — The risk that actively managed funds or investment managers may underperform their benchmarks or investment objectives.

No investment strategy can eliminate risk or guarantee positive results under all market conditions.

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### **Risk of Loss**

Clients should understand that investment recommendations are subject to market fluctuations and other risks beyond the firm's control. Past performance is not indicative of future results, and there can be no assurance that any investment strategy will achieve its intended objectives.

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## **Item 9 – Disciplinary Information**

DeLuca Financial Planning, LLC and its management have no disciplinary events to disclose.

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

DeLuca Financial Planning, LLC is not registered as a broker-dealer and does not sell securities, insurance products, or other investment products. The firm does not receive commissions, referral fees, or other forms of compensation from third parties in connection with client investments.

Neither the firm nor its management is registered, or has an application pending to register, as a broker-dealer, registered representative of a broker-dealer, futures commission merchant, commodity pool operator, or commodity trading advisor.

The firm does not have any related persons, including affiliates under common control, that are broker-dealers, investment advisers, insurance agencies, or other financial services firms. Any outside business activities or affiliations of the firm or its management that may present a potential conflict of interest will be disclosed to clients as required by law.

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

### **Code of Ethics**

DeLuca Financial Planning, LLC has adopted a Code of Ethics that governs the conduct of the firm, its management, and any persons who may be deemed access or related persons under applicable regulations. As a fiduciary, the firm is required to act in the best interests of its clients and to place client interests ahead of its own interests at all times.

The Code of Ethics is designed to address ethical standards of conduct, conflicts of interest, personal securities transactions, and the confidentiality of client information, as well as compliance with applicable laws and regulations. The firm requires acknowledgement of and adherence to the Code of Ethics and reviews it periodically to ensure it remains appropriate for the firm's activities.

A copy of the firm's Code of Ethics is available to clients and prospective clients upon request at no charge.

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### **Personal Trading and Conflicts of Interest**

The firm, its management, and any related persons may buy or sell securities for their own personal accounts that are the same as, or different from, those recommended to clients. As a result, personal trading activity may present potential conflicts of interest.

To address these potential conflicts, the firm has adopted policies and procedures reasonably designed to ensure that personal securities transactions do not place the interests of the firm or its personnel ahead of those of clients. These policies are intended to promote fair treatment of clients and compliance with fiduciary obligations.

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## **Trading Activity Around Client Transactions**

From time to time, the firm, its management, or related persons may engage in securities transactions at or around the same time that similar transactions are executed for client accounts. The firm has adopted policies and procedures reasonably designed to prevent access persons from placing their interests ahead of clients.

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## **Item 12 – Brokerage Practices**

### **Selection of Custodians and Broker-Dealers**

DeLuca Financial Planning, LLC does not have any affiliation with broker-dealers. Client assets are maintained with independent, qualified custodians selected based on factors such as reputation, financial strength, breadth of services, execution capabilities, technology, and cost.

Clients who engage the firm for financial planning services only are not required to custody assets with any particular custodian, and the firm does not take custody of client assets in connection with planning-only engagements.

For clients who engage the firm for ongoing investment advisory services, client assets are generally maintained at Charles Schwab & Co., Inc., a registered broker-dealer and member FINRA/SIPC, for operational efficiency, trading, and reporting purposes. Charles Schwab & Co., Inc. is independent of and unaffiliated with the firm and provides custody of assets, trade execution, clearance, settlement, and account reporting services. The firm does not receive compensation for selecting or recommending a particular custodian.

Clients are not required to maintain assets with the firm's preferred custodian and may select a different qualified custodian of their choosing. However, the firm's ability to provide certain investment advisory services depends on access to custodial platforms and related technology.

When a client selects a custodian not supported by the firm's operational systems, the firm may not be able to facilitate or assist with implementing transactions on the client's behalf through that custodian, monitor account activity, provide rebalancing support, obtain complete account data, or deduct advisory fees directly from the account. In such cases, clients may be required to implement investment recommendations independently, and the scope and efficiency of advisory services may be reduced. Use of a non-supported custodian may also limit the firm's ability to seek the most favorable execution under the circumstances.

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### **Best Execution and Soft Dollar Benefits**

The firm seeks to obtain best execution for client transactions, taking into account factors such as price, execution speed, transaction costs, and overall quality of execution. Best execution does not necessarily mean the lowest possible transaction cost, but rather the most favorable overall result under the circumstances.

The firm does not receive research, products, services, or other benefits (“soft dollar benefits”) in exchange for directing client brokerage transactions. The firm does not accept compensation tied to brokerage activity.

As part of its institutional platform, Charles Schwab & Co., Inc. may make available to the firm certain support services, technology, research, and practice management resources at no additional cost. These services are generally available to independent investment advisers utilizing the platform and are not contingent upon the direction of client transactions. The receipt of such benefits creates a potential conflict of interest because it may influence the firm’s recommendation of Schwab as custodian. The firm mitigates this conflict by periodically reviewing custodial arrangements to ensure they remain in clients’ best interests.

The firm periodically reviews custodial and execution arrangements as part of its fiduciary obligation.

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### **Client Referrals**

The firm does not receive client referrals from broker-dealers or third parties in exchange for directing brokerage transactions or maintaining client accounts at a particular custodian.

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### **Aggregation of Trades**

At this time, the firm does not routinely aggregate (block) trades for multiple client accounts. If aggregation is utilized in the future, the firm will seek to allocate trades among participating accounts in a fair and equitable manner consistent with its fiduciary obligations and applicable regulations.

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## Item 13 – Review of Accounts

Client accounts are reviewed on a periodic basis as part of the firm’s ongoing advisory services. The frequency and depth of reviews depend on the nature of the engagement, the services provided, and the client’s individual circumstances.

Account reviews generally focus on alignment with the client’s investment objectives, risk tolerance, time horizon, and any client-imposed restrictions. In addition to periodic reviews, accounts may be reviewed on an event-driven basis in response to factors such as changes in a client’s financial situation or goals, significant market movements, portfolio volatility, unusual performance, cash flows, or changes to investment strategy.

Clients receive transaction confirmations from the custodian for each trade executed in their accounts, as well as periodic account statements and other reports provided directly by the custodian. These statements typically include information regarding holdings, transactions, income, and account activity.

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## Item 14 – Client Referrals and Other Compensation

DeLuca Financial Planning, LLC does not provide or receive cash or non-cash compensation in exchange for client referrals. The firm does not participate in referral arrangements, solicitation agreements, or similar compensation arrangements with third parties.

The firm is compensated solely by fees paid directly by its clients, as disclosed in Item 5 of this brochure.

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## Item 15 – Custody

DeLuca Financial Planning, LLC does not hold, directly or indirectly, client funds or securities, nor does the Firm have authority to obtain possession of them except for the limited purpose of deducting advisory fees, as authorized by the client. All client assets are maintained with qualified custodians selected by the client.

If the Firm deducts its advisory fee from a client’s account(s), the following safeguards are applied:

- i. Clients provide written authorization permitting the Firm to be paid directly from accounts held by the qualified custodian.
- ii. The qualified custodian sends account statements directly to clients at least quarterly showing all disbursements from the account, including advisory fees deducted.
- iii. The Firm provides clients with an itemized invoice or fee calculation at the time fees are deducted, which includes the method of calculation, the assets on which the fee is based, and the time period covered by the fee.

Clients are urged to carefully review custodial statements and compare them to any fee information provided by the Firm and to notify the Firm promptly of any discrepancies. Clients are encouraged to review custodial statements and compare them to the Firm's fee calculations, as the custodian does not independently verify fee calculations.

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## Item 16 – Investment Discretion

DeLuca Financial Planning, LLC does not exercise discretionary authority over client accounts. Investment recommendations are implemented only after client approval for each transaction, as described in Item 4 of this brochure and in the client advisory agreement.

Clients are responsible for providing timely approval of recommendations. Delays in client authorization may affect trade timing, pricing, and investment results.

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## Item 17 – Voting Client Securities

The firm does not vote proxies on behalf of clients. Clients retain full responsibility for voting proxies and responding to corporate actions related to securities held in their accounts.

Proxy materials and shareholder communications are typically sent directly to clients by the account custodian. If the firm receives proxy materials on behalf of a client, the firm will forward such materials to the client in a timely manner.

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## Item 18 – Financial Information

The firm does not require or solicit prepayment of advisory fees more than six months in advance in excess of \$500 per client. The firm does not have any financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients.

The firm has not been the subject of a bankruptcy proceeding.

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## Item 19 – Requirements for State-Registered Advisers

### **Principal Officers**

Thomas J. DeLuca is the Founder, Principal Adviser, and Chief Compliance Officer of DeLuca Financial Planning, LLC. As a solo advisory firm, Mr. DeLuca is responsible for providing advisory services to clients and for overseeing the firm's compliance program.

Additional information regarding Mr. DeLuca's education, business background, and outside business activities is available in the Form ADV Part 2B Brochure Supplement provided to clients.

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### **Outside Business Activities**

Mr. DeLuca is the sole owner of Arbiter Media Group, LLC, a Pennsylvania limited liability company that provides website development, technical support, and online content production services.

Arbiter Media Group, LLC does not provide investment advisory services, does not solicit advisory clients, and does not receive compensation from advisory clients of DeLuca Financial Planning, LLC. This outside business activity represents approximately five percent (5%) of Mr. DeLuca's professional time.

Additional information regarding this outside business activity is disclosed in the Form ADV Part 2B Brochure Supplement.

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**Performance-Based Fees**

Neither DeLuca Financial Planning, LLC nor its management persons are compensated based on the performance of client accounts. Please refer to Item 6 of this brochure for additional information regarding performance-based fees.

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**Material Disciplinary Disclosures**

Neither DeLuca Financial Planning, LLC nor its management persons have been involved in any arbitration claim, civil proceeding, self-regulatory organization proceeding, or administrative proceeding related to investment advisory activities.

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**Material Relationships With Issuers of Securities**

Neither DeLuca Financial Planning, LLC nor its management persons have any relationship or arrangement with issuers of securities.