

Delta Wealth Advisors, LLC

Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of Delta Wealth Advisors, LLC. If you have any questions about the contents of this brochure, please contact us at (317) 735-6445 or by email at: info@deltawealthadv.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Delta Wealth Advisors, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. Delta Wealth Advisors, LLC's CRD number is: 310504.

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Registration as an investment adviser does not imply a certain level of skill or training.

Version Date: 03/08/2022

Item 2: Material Changes

Delta Wealth Advisors, LLC has the following material changes to report. Material changes relate to RIA Delta Wealth Advisors, LLC's policies, practices or conflicts of interests.

- The firm has added Pension Consulting to its services (Items 4 and 50)
- The firm has added private deals with issuers of unsecured debt to services and risks (Item 4, 5 and 8)
- The firm has added a conflict of interest regarding purchase of same or similar private equities as clients (Item 11)
- The firm has added a new branch office location (cover page)
- The firm has a new principal office address. (9/8/21)

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Item 4: Advisory Business

A. Description of the Advisory Firm

Delta Wealth Advisors, LLC (hereinafter “Delta Wealth Advisors”) is a Partnership organized in the State of Indiana. The firm was formed in October 2017, and the principal owners are Dino Nikolas Efthimiou and Nicholas Gerald Christ Finnagan.

B. Types of Advisory Services

Investment Advisory Services

Delta Wealth Advisors offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. Delta Wealth Advisors creates an Investment Policy Statement for each client, which outlines the client’s current situation (income, tax levels, and risk tolerance levels) and then constructs a plan to aid in the selection of a portfolio that matches each client's specific situation. Investment advisory services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

Delta Wealth Advisors evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. Delta Wealth Advisors will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

Delta Wealth Advisors seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of Delta Wealth Advisors’ economic, investment or other financial interests. To meet its fiduciary obligations, Delta Wealth Advisors attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, Delta Wealth Advisors’ policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is Delta Wealth Advisors’ policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent and other investment opportunities that might have a limited supply, among its clients on a fair and equitable basis over time.

Investment advisory services offered by Delta Wealth Advisors are available to clients in the AUM Model and Net Worth Model. These services are specifically tailored to meet the needs of each client. Prior to delivering investment advisory services, the Adviser will

ascertain each client's specific investment objective. Then Delta Wealth Advisors will allocate or recommend that the client allocate their investment assets consistent with the designated investment objective. Clients may impose reasonable restrictions on any of the Adviser's investment advisory services at any time, but restrictions must be delivered to the Adviser. More specifically, Delta Wealth Advisors will assist Clients in determining the appropriate allocation of the Clients' invested assets among different asset classes. In addition, the Adviser also provides active trading models to Clients consisting mostly of stocks and ETFs. Clients in the Adviser's active trading model must authorize the Adviser to exercise discretionary trading authority over the assets dedicated to the client's recommended investment strategy, which includes the initial allocation and ongoing rebalancing. The discretionary authority allows Delta Wealth Advisors to buy, sell or otherwise trade the assets in the client's account without prior approval of each transaction.

Financial Planning Services

Delta Wealth Advisors includes financial planning services to clients participating in their Net Worth Model at no additional cost or obligation. Delta Wealth Advisors begins with an intensive fact-finding session which helps the Adviser become totally familiar with the client's current financial situation (including among other things, income taxes, investments, insurance, estate affairs and family circumstances), as well as their personal goals and priorities for the next several years. Then, working from this comprehensive information, the Adviser prepares a detailed financial plan which documents the client's situation, identifies all areas which will be impacted, and makes specific goal-oriented recommendations. The Adviser's specific goal-oriented recommendations are designed to educate and allow a client to coordinate his/her financial affairs more efficiently, increase cash flow, prudently reduce income taxes, and attempt to improve his/her overall net worth. Once this written document has been discussed with the client, the recommendations that the client feels comfortable with are scheduled for implementation with specific deadlines to be met. Delta Wealth Advisors continues to assist the client based on a quarterly review of services in all applicable areas of financial planning including estate, retirement, cash flow and tax planning.

Please Note:

* It is always the client's responsibility to promptly notify Delta Wealth Advisors if there is any change in their financial situation or investment objective. This notification of change allows the Adviser an opportunity to review, evaluate, or revise our previous recommendations or services.

* Financial Planning is not available in the AUM Model.

Service Models

Delta Wealth Advisors offers two service models for their clients to best meet their individual needs.

AUM Model

The AUM model is a traditional investment management where the Adviser bases its annual investment management fee for managed discretionary assets upon a percentage

(%) of the market value of the assets and the specific types of investment management services provided. In this model client's receive an individually tailored plan addressing the following:

Client Goals
Risk Tolerance
Personal Tax Situation
Horizon
Liquidity

Net Worth Model

The Net Worth Model is a full spectrum of financial planning, asset management and tax services to align assets to goals with tax efficiency. In this model client's receive an individually tailored plan addressing the following:

Client Goals	Life Insurance Review
Personal Tax Situation	Long Term Care Insurance Review
Liquidity	Umbrella Liability Insurance Review
Risk Tolerance	Property & Casualty Insurance Review
Time Horizon	Health Insurance Review
Business Successions	Corporate Retirement Plan Guidance
Trust Services	Annuities
Personal Financial Statement	Identity Theft Prevention Planning
Income Tax Planning	Asset Protection Planning
Budgeting and Cash Management	Charitable Intent Evaluation
Retirement Funding	Charitable Giving Strategies
Education Planning	Debt Management
Social Security Planning	Employee Benefit Planning
Wealth transfer preferences	Estate Documentation Review
Asset Titling Confirmation	Beneficiary Designation Planning
End of Life Planning	Disability Insurance Review

Written Acknowledgement of Fiduciary Status

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title 1 of the Employee Retirement Income Act (ERISA) and the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put out interest ahead of yours. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than a level fee that is reasonable for our services; and
- Give you basic information about conflicts of interest.

Private Alternative Investments and Other Types of Investments Offered to Clients

From time-to-time Delta Wealth Advisors may offer net-worth clients that meet the definition of “accredited investors” opportunities that may include private investments, unsecured promissory notes, private equity funds, private business, venture capital and/or private equity fund advisers. Delta Wealth Advisors does not receive a fee from the issuers of these offerings when clients enter into these investment deals.

Delta Wealth does not charge origination, acquisition, monitoring or disposition fees on these Private Alternative Investments. Delta Wealth’s standard net worth advisory fee does apply to these investments. Delta Wealth does not charge an additional investment management fee for these private investment opportunities.

Delta Wealth works to follow industry best practices in vetting Private Alternative Investment opportunities. Standard vetting techniques include review of Operating Memorandum, Private Placement Memorandum, and other available documents.

Delta Wealth is responsible for reviewing and regularly communicating with General Partner, portfolio company and investment partners on private investment opportunities. For example, Delta Wealth regularly attends quarterly calls, summarizes key findings, and distributes updates to clients invested in the deal.

Services Limited to Specific Types of Investments

Delta Wealth Advisors generally limits its investment advice to mutual funds, fixed income securities, equities, ETFs (including ETFs in the gold and precious metal sectors), treasury inflation protected/inflation linked bonds, non-U.S. securities, venture capital funds, private equity and private placements, although Delta Wealth Advisors primarily recommends ETF. Delta Wealth Advisors may use other securities as well to help diversify a portfolio when applicable.

C. Client Tailored Services and Client Imposed Restrictions

Delta Wealth Advisors will tailor a program for each individual client through its use of model portfolios. This will include an interview session to get to know the client’s specific needs and requirements as well as a plan that will be executed by Delta Wealth Advisors on behalf of the client. Delta Wealth Advisors may use model allocations together with a specific set of recommendations for each client based on their personal restrictions, needs, and targets. Clients may impose reasonable restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent Delta Wealth Advisors from properly servicing the client account, or if the restrictions would require Delta Wealth Advisors to deviate from its standard suite of services, Delta Wealth Advisors reserves the right to end the relationship.

D. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, and certain other administrative fees. Delta Wealth Advisors does not participate in wrap fee programs.

E. Assets Under Management

Delta Wealth Advisors has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$81,407,111	\$102,455	December 2021

Item 5: Fees and Compensation

A. Fee Schedule

Investment Advisory Fees

Managed Discretionary Asset Fees for the AUM Model

The Adviser bases its annual investment management fee for managed discretionary assets upon a percentage (%) of the market value of the assets and the specific types of investment management services provided. Delta Wealth Advisors charges an annual fee based on the following fee schedule:

Total Assets Under Management	Annual Fees
\$1 - \$999,999	1.25%
\$1,000,000 - \$2,999,999	1.00%
\$3,000,000 - \$4,999,999	0.90%
\$5,000,000 - \$9,999,999	0.80%
\$10,000,000 - AND UP	0.70%

The advisory fee is calculated using the value of the assets in the Account on the last business day of the prior billing period.

Managed Discretionary Asset Fees for the Net Worth Model

The Adviser bases its annual investment management fee for managed discretionary assets upon a percentage (%) of your net worth. Delta Wealth Advisors charges an annual fee based on the following fee schedule:

Net Worth	Annual Fees
First \$10,000,000	0.50%
Next \$10,000,000	0.25%
Above \$20,000,000	0.10%
Minimum Annual Fee	\$10,000

These fees are generally negotiable and the final fee schedule will be memorialized in the client's advisory agreement. Clients may terminate the agreement without penalty for a full refund of Delta Wealth Advisors' fees within five business days of signing the Advisory Agreement. Thereafter, clients may terminate the Advisory Agreement immediately upon written notice.

Trailblazer (Subset of Net Worth)	Annual Fee
Net Worth below \$1,000,000	\$1,250 Quarterly Fee
	Eligible for Next Generation Clients

In Illinois, unless a client has received the firm's disclosure brochure at least 48 hours prior to signing the investment advisory contract, the investment advisory contract may be terminated by the client within five (5) business days of signing the contract without incurring any advisory fees.

Pension Planning Fee

Delta Wealth Advisors uses the value of the account as of the last business day of the billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based.

For start-up plans as of January 1, 2022, Delta Wealth Advisors will charge \$2,500 for 3(21) Fiduciary Services and \$3,500 for 3(38) Fiduciary services annually. A start-up plan is defined when an employer is developing a new pension plan for its employees, this may include all recordkeeping, TPA, plan design, etc.

Additional-flat fees will be assessed for -additional services that are added as the client may request, these other services may include but are not limited to; educational workshops, trainings and one on one meetings.

Private Alternative Investments and Other Types of Investment Fees

Expenses related to the ordinary servicing of the Private Alternative Investment Contract (executed between the client and third-party manager), including but not limited to, fund fees, security transaction fees, and/or platform fees shall be paid by the Client to the Manager under the Contract. Other non-ordinary fees or fees incurred at the direction of the Client shall be paid by the Client. The fees will not exceed any limit imposed by any regulatory agency. Specifically, Delta Wealth Advisors may direct clients to third parties for engagement with them for private alternative investment opportunities. All clients that will be directed to these investments will be required to prove accredited investor status.

B. Payment of Fees

Payment of Investment Advisory Fees

Delta Wealth Advisors' investment management fees shall be assessed quarterly, in advance, based on the asset values as of the day prior to the period being billed. New accounts will be assessed a prorated fee dependent upon the number of days remaining in the quarter. Delta Wealth Advisors clients must provide their consent in advance to direct debiting of investment management fees from their custodial account. The Investment Advisory Agreement and the custodial/ clearing agreement authorize the custodian to debit the client account for the amount of the Adviser's investment management fee, and to directly remit that investment management fee to Delta Wealth Advisors in compliance with regulatory procedures. In the limited event that the Adviser bills the client directly, payment in full is expected upon presentation of the invoice. In the event an agreement is terminated, the client will receive a prorated refund for fees paid in advance.

Payment of Financial Planning Fees

Delta Wealth Advisors provides financial planning services to Net Worth Model clients at no additional cost or obligation.

Payment of Pension Planning Fees

Pension planning fees will be paid either by using Advice Pay, credit card or check.

Private Alternative Investments and Other Types of Investment Fees

Fees for the selection of third-party private investments will be agreed upon between the client and the third party through a private offering agreement. (Net worth clients will continue to pay DWA the agreed upon fee).

C. Client Responsibility For Third Party Fees

Clients are responsible for the payment of all third party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by Delta Wealth Advisors. Please see Item 12 of this brochure regarding broker-dealer/custodian.

D. Prepayment of Fees

Delta Wealth Advisors collects fees in advance. Refunds for fees paid in advance but not yet earned will be refunded on a prorated basis and returned within fourteen days to the client via check, or return deposit back into the client's account.

For all asset-based fees paid in advance, the fee refunded will be equal to the balance of the fees collected in advance minus the daily rate* times the number of days elapsed in the billing period up to and including the day of termination. (*The daily rate is calculated by dividing the annual asset-based fee rate by 365.)

E. Outside Compensation For the Sale of Securities to Clients

Neither Delta Wealth Advisors nor its supervised persons accept any compensation for the sale of investment products, including asset-based sales charges or service fees from the sale of mutual funds.

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

Delta Wealth Advisors 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

Delta Wealth Advisors generally provides advisory services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals
- ❖ Corporations or Business Entities
- ❖ Accredited Investors

There is a \$5,000 limit in the Trailblazer accounts, and a \$10,000 limit for Net Worth Client, no minimum for other Delta Wealth Advisors' services.

Item 8: Methods of Analysis, Investment Strategies, & Risk of Loss

A. Methods of Analysis and Investment Strategies

Methods of Analysis

DWA's methods of analysis include modern portfolio theory, charting analysis, fundamental analysis and cyclical analysis.

Charting analysis involves the use of patterns in performance charts. DWA uses this 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.

Cyclical analysis involves the analysis of business cycles to find favorable conditions for buying and/or selling a security.

Modern portfolio theory is an investment approach that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, by carefully choosing the proportions of various assets.

Investment Strategies

Delta Wealth Advisors uses long term trading and short term trading.

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

B. Material Risks Involved

Methods of Analysis

Charting analysis strategy involves using and comparing various charts to predict long and short term performance or market trends. The risk involved in using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. This may not be the case.

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in

stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Cyclical analysis assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are two-fold: 1) the markets do not always repeat cyclical patterns and 2) if too many investors begin to implement this strategy, it changes the very cycles these investors are trying to exploit.

Modern portfolio theory assumes that investors are risk averse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

Investment Strategies

Long term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

Short term trading risks include liquidity, economic stability, and inflation, in addition to the long term trading risks listed above. Frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

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

C. Risks of Specific Securities Utilized

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency.

Mutual Funds: Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond “fixed income” nature (lower risk) or stock “equity” nature.

Equity investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

Fixed income investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

Exchange Traded Funds (ETFs): An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Risks in investing in ETFs include trading risks, liquidity and shutdown risks, risks associated with a change in authorized participants and non-participation of authorized participants, risks that trading price differs from indicative net asset value (iNAV), or price fluctuation and disassociation from the index being tracked. With regard to trading risks, regular trading adds cost to your portfolio thus counteracting the low fees that one of the typical benefits of ETFs. Additionally, regular trading to beneficially “time the market” is difficult to achieve. Even paid fund managers struggle to do this every year, with the majority failing to beat the relevant indexes. With regard to liquidity and shutdown risks, not all ETFs have the same level of liquidity. Since ETFs are at least as liquid as their underlying assets, trading conditions are more accurately reflected in implied liquidity rather than the average daily volume of the ETF itself. Implied liquidity is a measure of what can potentially be traded in ETFs based on its underlying assets. ETFs are subject to market volatility and the risks of their underlying securities, which may include the risks associated with investing in smaller companies, foreign securities, commodities, and fixed income investments (as applicable). Foreign securities in particular are subject to interest rate, currency exchange rate, economic, and political risks, all of which are magnified in emerging markets. ETFs that target a small universe of securities, such as a specific region or market sector, are generally subject to greater market volatility, as well as to the specific risks associated with that sector, region, or other focus. ETFs that use derivatives, leverage, or complex investment strategies are subject to additional risks. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed “electronic shares” not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the

official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors. The return of an index ETF is usually different from that of the index it tracks because of fees, expenses, and tracking error. An ETF may trade at a premium or discount to its net asset value (NAV) (or indicative value in the case of exchange-traded notes). The degree of liquidity can vary significantly from one ETF to another and losses may be magnified if no liquid market exists for the ETF's shares when attempting to sell them. Each ETF has a unique risk profile, detailed in its prospectus, offering circular, or similar material, which should be considered carefully when making investment decisions.

Private Equity funds carry certain risks. Capital calls will be made on short notice, and the failure to meet capital calls can result in significant adverse consequences, including but not limited to total loss of investment.

Private placements carry a substantial risk as they are subject to less regulation than are publicly offered securities, the market to resell these assets under applicable securities laws may be illiquid, due to restrictions, and the liquidation may be taken at a substantial discount to the underlying value or result in the entire loss of the value of such assets.

Venture capital funds invest in start-up companies at an early stage of development in the interest of generating a return through an eventual realization event; the risk is high as a result of the uncertainty involved at that stage of development.

Non-U.S. securities present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

A. Registration as a Broker/Dealer or Broker/Dealer Representative

Neither Delta Wealth Advisors nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither Delta Wealth Advisors nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

Dino Nikolas Efthimiou is owner in Delta Wealth CPA's & Advisors, LLC. From time to time, he may offer clients advice or products from those activities and clients should be aware that these services may involve a conflict of interest. Delta Wealth Advisors, LLC always acts in the best interest of the client and clients always have the right to decide whether or not to utilize the services of any Delta Wealth Advisors, LLC representative

in such individuals outside capacities. This outside business activity does not take up more than 5% of Mr. Efthimiou's time per week.

Nicholas Gerald-Christ Finnigan is owner in Delta Wealth CPA's & Advisors, LLC. From time to time, he may offer clients advice or products from those activities and clients should be aware that these services may involve a conflict of interest. Delta Wealth Advisors, LLC always acts in the best interest of the client and clients always have the right to decide whether or not to utilize the services of any Delta Wealth Advisors, LLC representative in such individuals outside capacities. This outside business activity does not take up more than 5% of Mr. Finnigan's time per week

D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections

Delta Wealth Advisors does not utilize nor select third-party investment advisers.

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

A. Code of Ethics

Delta Wealth Advisors has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Delta Wealth Advisors' Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

Delta Wealth Advisors does not recommend that clients buy or sell any security in which a related person to Delta Wealth Advisors or Delta Wealth Advisors has a material financial interest.

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of Delta Wealth Advisors may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of Delta Wealth Advisors to buy or sell the same securities before or after

recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. Delta Wealth Advisors will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

Delta Wealth Advisors and its associated persons may have material financial interests in issuers of securities that Delta Wealth Advisors may recommend for purchase or sale by advisory clients. This presents a conflict of interest in that Advisor and Client's will be purchasing the same or similar securities. These investments include the private funds, private equities and other non-liquid opportunities. The fact that Delta Wealth Advisors and its associated persons purchase or sell private offering for themselves does not indicate that these funds are vetted or managed differently than other securities that the Advisor or its related persons do not purchase or sell alongside the advisory clients.

D. Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of Delta Wealth Advisors may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of Delta Wealth Advisors to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, Delta Wealth Advisors will never engage in trading that operates to the client's disadvantage if representatives of Delta Wealth Advisors buy or sell securities at or around the same time as clients.

Item 12: Brokerage Practices

A. Factors Used to Select Custodians and/or Broker/Dealers

Custodians/broker-dealers will be recommended based on Delta Wealth Advisors' duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and Delta Wealth Advisors may also consider the market expertise and research access provided by the broker-dealer/custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in Delta Wealth Advisors' research efforts. Delta Wealth Advisors will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

Delta Wealth Advisors recommends TD Ameritrade Institutional, a division of TD Ameritrade, Inc. Member FINRA/SIPC.

1. Research and Other Soft-Dollar Benefits

While Delta Wealth Advisors has no formal soft dollars program in which soft dollars are used to pay for third party services, Delta Wealth Advisors may receive research, products, or other services from custodians and broker-dealers in connection with client securities transactions ("soft dollar benefits"). Delta Wealth Advisors may enter into soft-dollar arrangements consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any particular client will benefit from soft dollar research, whether or not the client's transactions paid for it, and Delta Wealth Advisors does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. Delta Wealth Advisors benefits by not having to produce or pay for the research, products or services, and Delta Wealth Advisors will have an incentive to recommend a broker-dealer based on receiving research or services. Clients should be aware that Delta Wealth Advisors' acceptance of soft dollar benefits may result in higher commissions charged to the client.

2. Brokerage for Client Referrals

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

3. Clients Directing Which Broker/Dealer/Custodian to Use

Delta Wealth Advisors may permit clients to direct it to execute transactions through a specified broker-dealer. If a client directs brokerage, then the client will be required to acknowledge in writing that the client's direction with respect to the use of brokers supersedes any authority granted to Delta Wealth Advisors to select brokers; this direction may result in higher commissions, which may result in a disparity between free and directed accounts; the client may be unable to participate in block trades (unless Delta Wealth Advisors is able to engage in "step outs"); and trades for the client and other directed accounts may be executed after trades for free accounts, which may result in less favorable prices, particularly for illiquid securities or during volatile market conditions. Not all investment advisers allow their clients to direct brokerage.

B. Aggregating (Block) Trading for Multiple Client Accounts

If Delta Wealth Advisors buys or sells the same securities on behalf of more than one client, then it may (but would be under no obligation to) aggregate or bunch such securities in a single transaction for multiple clients in order to seek more favorable prices, lower brokerage commissions, or more efficient execution. In such case, Delta Wealth Advisors would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. Delta Wealth Advisors would determine the appropriate number of shares and select the

appropriate brokers consistent with its duty to seek best execution, except for those accounts with specific brokerage direction (if any).

Item 13: Review of Accounts

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

All client accounts for Delta Wealth Advisors' advisory services provided on an ongoing basis are reviewed at least Quarterly by Dino N Efthimiou and Nicholas G.C. Finnagan, with regard to clients' respective investment policies and risk tolerance levels. All accounts at Delta Wealth Advisors are assigned to a reviewer.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

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).

C. Content and Frequency of Regular Reports Provided to Clients

Each client of Delta Wealth Advisors' advisory services provided on an ongoing basis will receive a monthly report detailing the client's account, including assets held, asset value, and calculation of fees. This written report will come from the custodian. Delta Wealth Advisors will also provide at least semiannual a separate written statement to the client.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

Delta Wealth Advisors participates in the institutional advisor program (the "Program") offered by TD Ameritrade. TD Ameritrade offers to independent investment advisor services which include custody of securities, trade execution, clearance and settlement of transactions. Delta Wealth Advisors receives some benefits from TD Ameritrade through its participation in the Program.

As disclosed above, Delta Wealth Advisors participates in TD Ameritrade's institutional advisor program and Delta Wealth Advisors may recommend TD Ameritrade to clients for custody and brokerage services. There is no direct link between Delta Wealth Advisors' participation in the Program and the investment advice it gives to its clients,

although Delta Wealth Advisors receives economic benefits through its 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 Delta Wealth Advisors 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 Delta Wealth Advisors' 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 Delta Wealth Advisors by third party vendors. TD Ameritrade may also pay for business consulting and professional services received by Delta Wealth Advisors' related persons. Some of the products and services made available by TD Ameritrade through the Program may benefit Delta Wealth Advisors but may not benefit its client accounts. These products or services may assist Delta Wealth Advisors in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help Delta Wealth Advisors manage and further develop its business enterprise. The benefits received by Delta Wealth Advisors or its personnel through participation in the Program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, Delta Wealth Advisors endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by Delta Wealth Advisors or its related persons in and of itself creates a conflict of interest and may indirectly influence the Delta Wealth Advisors' choice of TD Ameritrade for custody and brokerage services.

B. Compensation to Non - Advisory Personnel for Client Referrals

Delta Wealth Advisors does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

When advisory fees are deducted directly from client accounts at client's custodian, Delta Wealth Advisors will be deemed to have limited custody of client's assets and must have written authorization from the client to do so. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

Item 16: Investment Discretion

Delta Wealth Advisors provides discretionary and non-discretionary investment advisory services to clients. The advisory contract established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, Delta Wealth Advisors generally manages the client's account and makes investment decisions without consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share. In some instances, Delta Wealth Advisors' discretionary authority in making these determinations may be limited by conditions imposed by a client (in investment guidelines or objectives, or client instructions otherwise provided to Delta Wealth Advisors).

Item 17: Voting Client Securities (Proxy Voting)

Delta Wealth Advisors will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

Item 18: Financial Information

A. Balance Sheet

Delta Wealth Advisors neither requires nor solicits prepayment of more than \$500 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither Delta Wealth Advisors nor its management has any financial condition that is likely to reasonably impair Delta Wealth Advisors' ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

Delta Wealth Advisors has not been the subject of a bankruptcy petition in the last ten years.

Item 19: Requirements For State Registered Advisers

A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background

The education and business backgrounds of Delta Wealth Advisors' current management persons, Dino Nikolas Efthimiou and Nicholas Gerald- Christ Finnigan, can be found on the Form ADV Part 2B brochure supplements for those individuals.

B. Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any)

Other business activities for each relevant individual can be found on the Form ADV Part 2B brochure supplement for each such individual.

C. Calculation of Performance-Based Fees and Degree of Risk to Clients

Delta Wealth Advisors 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.

D. Material Disciplinary Disclosures for Management Persons of this Firm

There are no civil, self-regulatory organization, or arbitration proceedings to report under this section.

E. Material Relationships That Management Persons Have With Issuers of Securities (If Any)

See Item 10.C and 11.B.