

## Item 1: Cover Page



### **Spillane Financial Planning, Inc.**

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

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This brochure provides information about the qualifications and business practices of Spillane Financial Planning, Inc. If you have any questions about the contents of this brochure, please contact us at: 339-298-1570, or by email at: [rick.spillane@gmail.com](mailto:rick.spillane@gmail.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.

Spillane Financial Planning, Inc. is registered as an Investment Advisor with the State of Ohio. Registration of an Investment Advisor does not imply any level of skill or training.

Additional information about Spillane Financial Planning, Inc. is available on the SEC's website at **[www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)**. You can search this site by a unique identifying number, known as a CRD number. The CRD number for Spillane Financial Planning, Inc. is 131589.

Disciplinary history of Spillane Financial Planning, Inc. and its representatives can be obtained from the Ohio Division of Securities and the MA Securities Division upon request.

**March 15, 2023**

Spillane Financial Planning, Inc.

## Item 2: Material Changes

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### Annual Update

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations, and routine annual updates as required by securities regulators. The complete Disclosure Brochure or a Summary of Material Changes will be provided to each client annually and if a material change occurs in the business practices of Spillane Financial Planning, Inc.

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### Material Changes since the Last Update

The last annual update of this Brochure was filed on March 1, 2022. The following material changes have been made to this version of the Disclosure Brochure:

1. Item 1 – Cover Page: Changed the firm’s principal place of business and mailing address from Massachusetts to Ohio.
  2. Item 4 – Types of Advisory Services: Eliminated financial planning services for a fixed monthly fee. All financial planning engagements are now provided on an hourly rate basis. Also eliminated the “Strategy Sessions”.
  3. Item 5 – Investment Consulting: Increased hourly rate to \$200 and revised description of how and when fees are billed and paid.
  4. Item 5 – Financial Planning: Eliminated fixed monthly fee arrangement; increased hourly rate to \$200; revised description of how and when fees are billed and paid.
  5. Item 15 - Custody: Revised to indicate that the firm has custody solely due to the ability to deduct advisory fees from client accounts held at a qualified custodian, and when acting pursuant to a Standing Letter of Authorization (SLOA). In all cases, the firm complies with the safekeeping requirements and is therefore exempt from the custody requirements.
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### Full Brochure Available

At any time, you may view the current Disclosure Brochure online at the SEC’s Investment Adviser Public Disclosure website at <http://www.adviserinfo.sec.gov> by searching for our firm name or by our CRD number (131589).

You may request a copy of this Disclosure Brochure at any time by contacting us by telephone at 339-298-1570 or by email at: [rick.spillane@gmail.com](mailto:rick.spillane@gmail.com).

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## Item 4: Advisory Business

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### Firm Description

Spillane Financial Planning, Inc. is registered as an Investment Advisor principally located in the state of Ohio. The firm was founded in 2004 and organized as a corporation (S-Corporation) in the Commonwealth of Massachusetts. In 2023, the firm moved its primary office to Ohio and now operates as an Ohio S-Corporation.

As used in this Brochure, the words “SFP”, “we”, “our firm”, “Advisor” and “us” refer to Spillane Financial Planning, Inc. And the words “you”, “their”, and “Client” refer to you as either a client or prospective client of the firm.

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### Principal Owners

SFP is solely owned and operated by Richard W. Spillane. All major decisions of a strategic and administrative nature for SFP are undertaken by Richard W. Spillane. There are no intermediate subsidiaries.

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### Types of Advisory Services

Spillane Financial Planning, Inc. is a fee-only firm, meaning the only compensation we receive is from our clients for our services. We offer financial planning, investment management, and investment consulting services in the form of ongoing engagements. From time to time, SFP recommends third-party professionals such as attorneys, accountants, tax advisors, insurance agents, or other professionals. Clients are never obligated to utilize any third-party professional we recommend. SFP is not affiliated with, nor does SFP receive any compensation from third-party professionals we may recommend.

### Investment Management Services

We provide continuous advice to a Client regarding the investment of Client funds based on the individual needs of the Client. Through personal discussions in which goals and objectives based on a Client’s particular circumstances are established, we develop a Client’s personal investment policy or investment plan with an asset allocation target, and create and manage a portfolio based on that policy and allocation targets. Account supervision is guided by the Client’s stated investment objectives (e.g., capital appreciation, income, capital preservation, etc.) as well as risk tolerance, risk capacity, investment time horizon, and liquidity needs. We will also review and discuss a Client’s prior investment history, as well as family composition and background.

We primarily advise our Clients regarding investments in stocks, bonds, mutual funds, ETFs, U.S. government and municipal securities, and cash and cash equivalents. We may also provide advice regarding investments held in a Client’s portfolio at the inception of our advisory relationship and/or other investment types not listed above, at the Client’s request.

When we provide investment management services, Clients grant us limited authority to buy and sell securities on a discretionary basis. More information on our trading authority is explained in Item 16 of this Brochure. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors.

**Investment Consulting Services**

We provide investment consulting services to Clients on an “as needed” basis for clients who wish to manage their own investment accounts. Such services may include: a personal risk profile analysis; determining an appropriate asset allocation plan that is consistent with the Client’s risk tolerance and investment objectives; helping the client develop a long-term strategy; investment research; investment recommendations; and assistance setting up investment accounts with independent custodians. We may meet with the client on a periodic basis to discuss changes in their personal or financial situation, and to provide guidance on rebalancing the portfolio. We do not have trading authority over the Client’s account(s). The client is responsible for the ongoing management of the portfolio and for placing all trades.

**Financial Planning Services**

Financial planning involves an evaluation of a Client’s current and future financial state by using currently known variables to predict future cash flows, asset values, and withdrawal plans. The key defining aspect of financial planning is that through the financial planning process, all questions, information, and analysis will be considered as they affect and are affected by the entire financial and life situation of the Client.

Clients work one-on-one with the firm on an ongoing basis over an extended period of time. Through this ongoing arrangement, Clients are expected to collaborate with us to develop and assist in the implementation of their financial plan. Clients purchasing this service will receive a written or electronic report, providing the Client with a detailed financial plan designed to help the Client achieve his or her financial goals and objectives. Clients are encouraged to update their plan on an annual basis, or when there is a significant change in their financial situation, or when they want to explore different “what if” scenarios.

Upon engaging the firm for financial planning, we will be responsible for obtaining and analyzing all necessary qualitative and quantitative information from the Client that is essential to understanding the Client’s personal and financial circumstances; helping the Client identify and prioritize certain financial goals while understanding the effect that pursuing one goal may have on other potential goals; assessing the Client’s current course of action and alternative courses of action to identify required changes that provide the best opportunity for the Client to meet their financial goals; developing and presenting financial planning recommendations based on the aforementioned actions while including all information that was required to be considered in preparing the recommendations; and providing ongoing assistance to the Client, as needed, to help the Client achieve their goals and objectives.

Our financial planning process focuses on the development of a Lifetime Spending Plan. The Lifetime Spending Plan will show the Client how much to save, spend, and insure each year in order to maintain a stable living standard over time. The Lifetime Spending Plan typically includes alternative planning scenarios and Living Standard Monte Carlo Analysis.

In general, the financial plan may address any or all of the following areas of concern. The Client and Advisor will work together to select the specific areas to cover. These areas may include, but are not limited to, the following:

- **Financial Goals:** We will help clients identify financial goals and develop a plan to reach them. We will identify what you want to accomplish, what resources you will need to make it happen, how much time you will need to reach the goal, and how much you should budget for your goal.
- **Business Planning:** We provide consulting services for clients who currently operate their own business, are considering starting a business, or are planning for an exit from their current business. Under this type of engagement, we work with you to assess your current situation, identify your objectives, and develop a plan aimed at achieving your goals.
- **Cash Flow and Debt Management:** We will conduct a review of your income and expenses to determine your current surplus or deficit along with advice on prioritizing how any surplus should be used or how to reduce expenses if they exceed your income. Advice may also be provided on which debts to pay off first based on factors such as the interest rate of the debt and any income tax ramifications. We may also recommend what we believe to be an appropriate cash reserve that should be considered for emergencies and other financial goals, along with a review of accounts (such as money market funds) for such reserves, plus strategies to save desired amounts.
- **College Savings:** Includes projecting the amount that will be needed to achieve college or other post-secondary education funding goals, along with advice on ways for you to save the desired amount. Recommendations as to savings strategies are included, and, if needed, we will review your financial picture as it relates to eligibility for financial aid or the best way to contribute to grandchildren (if appropriate).
- **Estate Planning:** This usually includes an analysis of your exposure to estate taxes and your current estate plan, which may include whether you have a will, powers of attorney, trusts and other related documents. Our advice also typically includes ways for you to minimize or avoid future estate taxes by implementing appropriate estate planning strategies such as the use of applicable trusts. We always recommend that you consult with a qualified attorney when you initiate, update, or complete estate planning activities. We may provide you with contact information for attorneys who specialize in estate planning when you wish to hire an attorney for such purposes. From time-to-time, we will participate in meetings or phone calls between you and your attorney with your approval or request.
- **Insurance:** Review of existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home and automobile. If no coverage currently exists, we may analyze the risks associated with having no coverage and suggest that coverage be put in place.



- **Investment Analysis:** This may involve developing an asset allocation strategy to meet your financial goals and risk tolerance, providing information on investment vehicles and strategies, reviewing employee stock options, as well as assisting you in establishing your own investment account at a selected broker/dealer or custodian. The strategies and types of investments we may recommend are further discussed in Item 8 of this brochure.
- **Retirement Planning:** Our retirement planning independence services typically include projections of your likelihood of achieving your financial goals, and how to maintain your desired lifestyle throughout your lifetime. For situations where projections show less than the desired results, we may make recommendations, including those that may impact the original projections by adjusting certain variables (i.e., working longer, saving more, spending less, taking more risk with investments). If you are near retirement or already retired, advice may be given on appropriate distribution strategies to minimize the likelihood of running out of money or having to adversely alter spending during your retirement years.
- **Employee Benefits Optimization:** We will provide review and analysis as to whether you, as an employee, are taking the maximum advantage possible of your employee benefits. If you are a business owner, we will consider and/or recommend the various benefit programs that can be structured to meet both business and personal retirement goals.
- **Risk Management:** A risk management review includes an analysis of your exposure to major risks that could have a significant adverse impact on your financial picture, such as premature death, disability, property and casualty losses, or the need for long-term care planning. Advice may be provided on ways to minimize such risks and about weighing the costs of purchasing insurance versus the benefits of doing so and, likewise, the potential cost of not purchasing insurance (“self-insuring”).
- **Tax Planning Strategies:** Advice may include ways to minimize current and future income taxes as a part of your overall financial planning picture. For example, we may make recommendations on which type of account(s) or specific investments should be owned based in part on their “tax efficiency,” with consideration that there is always a possibility of future changes to federal, state or local tax laws and rates that may impact your situation. We recommend that you consult with a qualified tax professional before initiating any tax planning strategy, and we may provide you with contact information for accountants or attorneys who specialize in this area if you wish to hire someone for such purposes. We will participate in meetings or phone calls between you and your tax professional with your approval.

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#### **Tailored Relationships and Client Imposed Restrictions**

We offer the same suite of services to all clients. However, we tailor the delivery of our services to meet the individual needs of our Clients. We consult with Clients initially and on an ongoing basis, through the duration of their engagement with us, to determine risk tolerance, time horizon, and other factors that may impact the Client’s investment and/or planning needs.

Clients are able to specify, within reason, any restrictions they would like to place as it pertains to individual securities and/or sectors that will be traded in their account or recommended by us. All such requests must be provided to us in writing. We will notify Clients if we are unable to accommodate any requests.

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**Assets Under Management**

As of December 31, 2022, Spillane Financial Planning, Inc. had approximately \$36.6 million in discretionary assets under management and \$0 in non-discretionary assets under management. Spillane Financial Planning, Inc. also had “view only” access to accounts totaling approximately \$1.8 million. The Client is responsible for the ongoing management of these “view only” accounts, including placing all trades.

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**Wrap Fee Programs**

Spillane Financial Planning, Inc. does NOT participate in any wrap fee programs. A wrap fee program is defined as any arrangement in which a client is charged a specified fee or fees, not based directly on transactions in the client’s account, for investment advisory services and the execution of client transactions.

## Item 5: Fees and Compensation

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**Investment Management**

**Standard Fee:** The fee is based on a percentage of assets under management and is negotiable. The annualized fees for investment management services are based on the following fee schedule:

Assets Under Management	Annual Advisory Fee
<b>\$0 - \$250,000</b>	0.85%
<b>\$250,001 - \$500,000</b>	0.75%
<b>\$500,001 - \$1,000,000</b>	0.65%
<b>Above \$1,000,000</b>	0.50%

The annual advisory fee is paid quarterly, in advance, based on the value of the Client’s account(s) at the end of the previous quarter. The value of the account at the end of the quarter shall be determined by adding the value of securities, cash equivalents, and any cash value in the account. If the account has a negative cash balance, the fee will be charged on the total assets under management, which will not include any cash debt (borrowings). We rely on the account valuations as provided by the Client’s custodian in determining assets under management. Fees are prorated for any partial billing periods occurring during the period, including the initial and terminating billing periods.

The quarterly advisory fee is a blended fee that is calculated by assessing the percentage rates using the predefined levels of assets as shown in the above chart, resulting in a combined weighted fee. For example, an account valued at \$1,500,000 would pay an effective fee of 0.65% with an annual fee of \$9,750. The quarterly fee is determined by the following calculation:  $((\$250,000 \times 0.85\%) + (\$250,000 \times 0.75\%) + (\$500,000 \times 0.65\%) + (\$500,000 \times 0.50\%)) \div 4 = \$2,437.50$ . In determining the blended advisory fee, we may allow accounts of members of the same household to be aggregated. No increase in the annual fee shall be effective without agreement from the client by signing a new agreement or amendment to their current advisory agreement.

**Negotiated Fee:** The Client and the Advisor may agree to a negotiated quarterly fee in lieu of the standard blended fee described above. This may be a Fixed Quarterly Dollar Amount or a Fixed Quarterly Percentage. When using the fixed quarterly percentage, the value of the Client's account(s) at the end of the previous quarter will be determined in the same manner as described above for the Standard Fee. The negotiated fee may NOT exceed the standard blended fee. Fees are prorated for any partial billing periods occurring during the period, including the initial and terminating billing periods.

**Payment of Fees:** Advisory fees are directly deducted from one or more of the client's investment accounts held by an independent qualified custodian, upon advanced written consent by the client. Please refer to Item 15 of this Brochure regarding our policy on direct fee deduction. Clients may also pay an invoice directly, by electronic funds transfer or by check, instead of having the fee directly deducted from their investment account(s). In such cases, invoices will be sent directly to the Client and are due and payable upon receipt.

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### Investment Consulting

We are compensated at a rate of \$200 per hour. This rate is NOT negotiable. At the start of the engagement, we will provide the Client with a good faith estimate of the number of hours required to complete the initial agreed upon services. We may collect a portion of the quoted fee (up to 50%) as a retainer.

Actual billed fees may differ from the quoted fee. The quoted fee is an estimate, based on the initial agreed upon services, and the facts and circumstances known at the start of the engagement. The actual fee could be higher if the length of time required to service the Client increases. Examples include: (a) the Client's financial situation is more complex than what was originally disclosed or known at the start of the engagement; (b) the scope of the work for the initial agreed upon services changes; and (c) the Client requests additional consulting services subsequent to the completion of the initial agreed upon services.

Client invoices are submitted to the Client, in arrears, as necessary. In general, hours worked will be tallied at the end of each month (in 15-minute increments) and invoiced on a quarterly basis. Invoices are due and payable upon receipt and may be paid by electronic funds transfer or check. At no time will the Client be charged more than five-hundred dollars (\$500) six months or more in advance of rendering services. We will not bill the client in excess of the quoted fee +10% without first discussing the reason for the fee increase with the Client and documenting the reason in the Client's file.

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**Financial Planning**

We are compensated at a rate of \$200 per hour. This rate is NOT negotiable. At the start of the engagement, we will provide the Client with a good faith estimate of the number of hours required to complete the initial agreed upon services. We may collect a portion of the quoted fee (up to 50%) as a retainer.

Actual billed fees may differ from the quoted fee. The quoted fee is an estimate, based on the initial agreed upon services, and the facts and circumstances known at the start of the engagement. The actual fee could be higher if the length of time required to service the Client increases. Examples include: (a) the Client's financial situation is more complex than what was originally disclosed or known at the start of the engagement; (b) the scope of the work for the initial agreed upon services changes; and (c) the Client requests additional planning services subsequent to the completion of the initial agreed upon services.

Client invoices are submitted to the Client, in arrears, as necessary. In general, hours worked will be tallied at the end of each month (in 15-minute increments) and invoiced on a quarterly basis. Invoices are due and payable upon receipt and may be paid via electronic funds transfer or check. At no time will the Client be charged more than five-hundred dollars (\$500) six months or more in advance of rendering services. We will not bill the client in excess of the quoted hours without first consulting with the Client and documenting the reason for the fee increase in the Client's file.

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**Other Types of Fees and Expenses**

Our fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which may be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, and other third parties such as custodial fees, deferred sales charges, odd-lot differentials, transaction and trading fees, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds (ETFs) also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees, and commissions are exclusive of and in addition to our fee, and we shall not receive any portion of these commissions, fees, and costs.

Item 12 of this Brochure further describes the factors we consider in selecting or recommending custodians for Client's transactions and determining the reasonableness of their compensation (e.g., commissions).

Clients may incur fees from third-party professionals such as accountants and attorneys that we may recommend, upon Client request. Such fees are separate and distinct from SFP's advisory fees.

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**Termination and Refunds**

Investment management services may be terminated at any time, without penalty, upon written notification by the Client or the Advisor. Termination will be effective as of the date of the notification or at a later date as may be agreed to by the Client and the Advisor. Since fees are paid in advance, a prorated refund will be given, if applicable, and will be based on the number of days the account(s) were open during the period.

Investment consulting services may be terminated at any time, without penalty, upon written notification by the Client or the Advisor. Termination will be effective as of the date of the termination notice or at a later date as may be agreed to by the Client and the Advisor. If fees are paid in advance, a prorated refund will be given, if applicable, for any unearned fees. For fees paid in arrears, the Client shall be charged a pro-rata fee based on the work completed up to the date of termination.

Financial planning services may be terminated at any time, without penalty, upon written notification by the Client or the Advisor. Termination will be effective as of the date of the termination notice or at a later date as may be agreed to by the Client and the Advisor. If fees are paid in advance, a prorated refund will be given, if applicable, for any unearned fees. For fees paid in arrears, the Client shall be charged a pro-rata fee based on the work completed up to the date of termination.

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

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### **Performance-Based Fees and Side-By-Side Management**

We do not offer performance-based fees and do not engage in side-by-side management.

## **Item 7: Types of Clients**

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### **Description**

We provide financial planning, investment consulting, and investment management services to individuals, high net worth individuals (defined as someone with a net worth of at least \$1.5 million or \$750,000 of investible or liquid assets), trusts, and small businesses.

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### **Account Minimums**

We do not have a minimum account size requirement.

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

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### **Methods of Analysis**

Our primary method of security analysis is fundamental analysis. But we may include technical analysis, cyclical analysis, and charting analysis as needed.

**Fundamental Analysis** involves analyzing individual securities and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience, and expertise of the company's management, and the outlook for the company's industry. The resulting data is used to measure the true value of the company's stock compared to the current market value. The risk of fundamental analysis is that information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

**Technical analysis** involves using chart patterns, momentum, volume, and relative strength in an effort to pick sectors that may outperform market indices. However, there is no assurance of accurate forecasts or that trends will develop in the markets we follow. In the past, there have been periods without discernible trends and similar periods will presumably occur in the future. Even where major trends develop, outside factors like government intervention could potentially shorten them.

Furthermore, one limitation of technical analysis is that it requires price movement data, which can translate into price trends sufficient to dictate a market entry or exit decision. In a trendless or erratic market, a technical method may fail to identify trends requiring action. In addition, technical methods may overreact to minor price movements, establishing positions contrary to overall price trends, which may result in losses. Finally, a technical trading method may underperform other trading methods when fundamental factors dominate price moves within a given market.

**Cyclical analysis** is a type of technical analysis that involves evaluating recurring price patterns and trends based upon business cycles. Economic/business cycles may not be predictable and may have many fluctuations between long term expansions and contractions. The lengths of economic cycles may be difficult to predict with accuracy and therefore the risk of cyclical analysis is the difficulty in predicting economic trends and consequently the changing value of securities that would be affected by these changing trends.

**Charting analysis** involves the gathering and processing of price and volume information for a particular security. This price and volume information is analyzed using mathematical equations. The resulting data is then applied to graphing charts, which is used to predict future price movements based on price patterns and trends. Charts may not accurately predict future price movements. Current prices of securities may not reflect all information about the security and day-to-day changes in market prices of securities may follow random patterns and may not be predictable with any reliable degree of accuracy.

**Modern Portfolio Theory (MPT):** There are several underlying principles of MPT.

- Investors are risk averse. The only acceptable risk is that which is adequately compensated by an expected return. Risk and investment return are related, and an increase in risk requires an increase in expected return.
- Markets are efficient. The same market information is available to all investors at the same time. The market prices every security fairly based upon this equal availability of information.
- The design of the portfolio as a whole is more important than the selection of any particular security. The appropriate allocation of capital among asset classes will have far more influence on long-term portfolio performance than the selection of individual securities.
- Investing for the long-term (preferably longer than ten years) becomes critical to investment success because it allows the long-term characteristics of the asset classes to surface.
- Increasing diversification of the portfolio with lower correlated asset class positions can decrease portfolio risk. Correlation is the statistical term for the extent to which two asset classes move in tandem or opposition to one another.

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

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

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## Investment Strategies

**Asset Allocation:** We begin by attempting to identify an appropriate ratio of equities, fixed income, and cash suitable to the Client's investment objectives, time horizon, risk tolerance, liquidity needs, and other relevant factors. We also consider the importance of diversifying across different stock styles (e.g., small cap value, large cap growth), stock regions (e.g., U.S., international, emerging markets) and fixed income types (e.g., government and corporate).

A risk of asset allocation is that the Client may not participate in sharp increases in a particular security, industry, or market sector. Another risk is that the ratio of equities, fixed income, and cash will change over time due to stock and market movements and, if not corrected, will no longer be appropriate for the Client's goals. We attempt to closely monitor our asset allocation models and make changes periodically to keep in line with the target allocation.

**Passive Investing:** We primarily follow a passive investing approach. Passive investing involves building portfolios that are composed of very distinct asset classes. The asset classes are weighted in a manner to achieve the desired relationship between correlation, risk, and return. Funds that passively capture the returns of the desired asset classes are placed in the portfolio. The funds that are used to build passive portfolios are typically index mutual funds or exchange-traded funds.

Passive investment management is characterized by low portfolio expenses (i.e., the funds inside the portfolio have low internal costs), minimal trading costs (due to infrequent trading activity), and relative tax efficiency (because the funds inside the portfolio are tax efficient and turnover inside the portfolio is minimal).

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## Material Risks Involved

All investing strategies we offer and investment recommendations we make involve risk and may result in a loss of your original investment which you should be prepared to bear. Many of these risks apply equally to stocks, bonds, commodities, and any other investment or security. Material risks associated with our investment strategies and recommendations are listed below.

**Market Risk:** Market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the value of the investment regardless of the operational success of the issuer's operations or its financial condition. This type of risk is caused by external factors such as political, economic and social conditions.

**Strategy Risk:** The Advisor's investment strategies and/or investment techniques may not work as intended.

**Small and Medium Cap Company Risk:** Securities of companies with small and medium market capitalizations are often more volatile and less liquid than investments in larger companies. Small and medium cap companies may face a greater risk of business failure, which could increase the volatility of your portfolio.

**Turnover Risk:** Actively managed mutual funds tend to have a higher turnover rate than passive funds. A high portfolio turnover would result in higher transaction costs and in higher taxes when shares are held in a taxable account. These factors may negatively affect the account's performance.

**Limited markets:** Certain securities may be less liquid (harder to sell or buy) and their prices may at times be more volatile than at other times. Under certain market conditions we may be unable to sell or liquidate investments at prices we consider reasonable or favorable or find buyers at any price.

**Concentration Risk:** Certain investment strategies focus on particular asset-classes, industries, sectors or types of investment. From time to time, these strategies may be subject to greater risks of adverse developments in such areas of focus than a strategy that is more broadly diversified across a wider variety of investments.

**Interest Rate Risk:** Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true: bond prices generally rise when interest rates fall. In general, fixed income securities with longer maturities are more sensitive to these price changes. Most other investments are also sensitive to the level and direction of interest rates.

**Legal or Legislative Risk:** Legislative changes or Court rulings may impact the value of investments, or the securities' claim on the issuer's assets and finances.

**Inflation:** Inflation may erode the buying-power of your investment portfolio, even if the dollar value of your investments remains the same.

**Currency/Exchange Rate Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country.

**Reinvestment Risk:** Proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e., interest rate).

**Risks Associated with Securities:** Apart from the general risks outlined above, which apply to all types of investments, specific securities may have other risks.

- **Common stocks** may go up and down in price quite dramatically, and in the event of an issuer's bankruptcy or restructuring could lose all value. A slower-growth or recessionary economic environment could have an adverse effect on the price of all stocks.



- **Corporate Bonds** are debt securities to borrow money. Generally, issuers pay investors periodic interest and repay the amount borrowed either periodically during the life of the security and/or at maturity. Alternatively, investors can purchase other debt securities, such as zero-coupon bonds, which do not pay current interest, but rather are priced at a discount from their face values and their values accrete over time to face value at maturity. The market prices of debt securities fluctuate depending on such factors as interest rates, credit quality, and maturity. In general, market prices of debt securities decline when interest rates rise and increase when interest rates fall. The longer the time to a bond's maturity, the greater its interest rate risk.
- **Commercial Paper** is, in most cases, an unsecured promissory note that is issued with a maturity of 270 days or less. Being unsecured the risk to the investor is that the issuer may default.
- **Bank Obligations** including bonds and certificates of deposit may be vulnerable to setbacks or panics in the banking industry. Banks and other financial institutions are greatly affected by interest rates and may be adversely affected by downturns in the U.S. and foreign economies or changes in banking regulations.
- **Municipal Bonds** are debt obligations generally issued to obtain funds for various public purposes, including the construction of public facilities. Municipal bonds pay a lower rate of return than most other types of bonds. However, because of a municipal bond's tax-favored status, investors should compare the relative after-tax return to the after-tax return of other bonds, depending on the investor's tax bracket. Investing in municipal bonds carries the same general risks as investing in bonds in general. Those risks include interest rate risk, reinvestment risk, inflation risk, market risk, call or redemption risk, credit risk, and liquidity and valuation risk.
- **Options and other derivatives** carry many unique risks, including time-sensitivity, and can result in the complete loss of principal. While covered call writing does provide a partial hedge to the stock against which the call is written, the hedge is limited to the amount of cash flow received when writing the option. When selling covered calls, there is a risk the underlying position may be called away at a price lower than the current market price.
- **Mutual Funds.** When a client invests in open end mutual funds or ETFs, the client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, many of which may be duplicative. In addition, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives).

- **Exchange Traded Funds** prices may vary significantly from the Net Asset Value throughout the day due to market conditions and changes in the price of the underlying holdings. Certain Exchange Traded Funds may not track underlying benchmarks as expected. ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value; (ii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally; (iii) certain ETFs may employ leverage, which creates additional volatility and price risk depending on the amount of leverage utilized, the collateral, and the liquidity of the supporting collateral. Further, the use of leverage (i.e., employing the use of margin) generally results in additional interest costs to the ETF; (iv) volatility and liquidity can severely and negatively impact the price of the ETF's underlying portfolio securities, thereby causing significant price fluctuations of the ETF; and (v) Authorized Participant(s) could decide to no longer participate in providing liquidity to an ETF, causing the ETF to trade at a discount to net asset value and face possibly delisting. The Adviser has no control over the risks taken by the underlying funds in which clients invest. While ETFs may provide diversification, risks can be significantly increased for funds concentrated in a particular sector of the market, or that primarily invest in small cap or speculative companies, use leverage (i.e., borrow money), or concentrate in a particular type of security rather than balancing the fund with different types of securities. ETFs can be bought and sold throughout the day and their price can fluctuate throughout the day. During times of heightened market volatility, the price of an ETF can be lower than that of the actual underlying securities. ETF managers trade fund investments in accordance with fund investment objectives and a particular investment strategy, and the ETF may be limited by its investment strategy. In addition to the internal cost of the ETF that is usually paid by the investor, many ETFs are also subject to trading costs from the custodian when you purchase and/or sell the ETF from your account.
- **Digital Assets.** Investing in digital assets such as Bitcoin or Ethereum, whether directly through an exchange or indirectly through another product, involves the general risks of investing in other investment vehicles. In addition, the value of digital assets are subject to significant fluctuations, can be highly volatile, and can change dramatically even intraday. The price of digital assets could drop precipitously for a variety of reasons, including, but not limited to, a crisis of confidence in the network, or a change in user preference for competing assets.

Digital assets represent an emerging asset class. As a result, the market infrastructure through which it is exchanged and regulatory foundation upon which it is regulated are still in their respective infancy when compared to more traditional assets like stocks, bonds, mutual funds, ETFs, or similar. Digital assets are not protected by the Federal Deposit Insurance Corporation (FDIC) or the Securities Investor Protection Corporation (SIPC). Any exposure to digital assets can result in substantial loss and investors should be able to withstand significant if not complete loss of invested capital.

Digital assets facilitate decentralized, peer-to-peer financial exchange and value storage that is used like money, without the oversight of a central authority or banks. The value of digital assets is wholly derived from their monetary premium and is not backed by any government, corporation, other identified body, or other physical assets. The exchange and availability of digital assets are dependent on the availability and proper functioning of the internet, the electronic platforms storing such digital assets, and the owner's control and possession of any needed password or digital key. Any downtime, unavailability, cybersecurity breach, or loss of access is a risk that a digital asset investor should be prepared to bear. The loss, destruction, or compromise of a private key may result in a loss of the digital assets, typographical errors may lead to loss of the digital assets, and digital asset trade errors cannot be unwound. Accordingly, the indirect exposure to digital assets through securities of publicly listed companies is also susceptible to these risks.

## **Item 9: Disciplinary Information**

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### **Criminal or Civil Actions**

SFP and its management persons have not been involved in any criminal or civil action.

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### **Administrative Enforcement Proceedings**

SFP and its management persons have not been involved in any administrative enforcement proceedings.

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### **Self-Regulatory Organization Enforcement Proceedings**

SFP and its management persons have not been involved in any legal or disciplinary events that are material to a Client's or prospective Client's evaluation of SFP or the integrity of its management.

Clients can obtain the disciplinary history of SFP or any of its representatives from the Ohio Division of Securities (614-644-7381) and the Massachusetts Securities Division (617-727-3548).

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

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### **Broker-Dealer Affiliations**

Neither SFP or its management persons is registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

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**Other Affiliations**

Neither SFP nor its management persons is registered, or have an application pending to register, as a futures commission merchant, commodity pool operator, commodity trading advisor, or an associated person of the foregoing entities.

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**Related Persons**

Richard W. Spillane, the sole owner and President of Spillane Financial Planning, Inc., also operates a CPA firm (d/b/a "**Richard W. Spillane, CPA**") that provides tax, accounting, and related services to clients. A client of Spillane Financial Planning, Inc. may also be a client of Richard W. Spillane, CPA. However, no client of Spillane Financial Planning, Inc. is obligated to use the tax and accounting services of Richard W. Spillane, CPA, and no client of Richard W. Spillane, CPA is obligated to use the financial planning or investment advisory services of Spillane Financial Planning, Inc. No referral fees are paid to either entity by the other. Tax and accounting services provided by Richard W. Spillane CPA are separate and distinct from the advisory services provided by Spillane Financial Planning, Inc.

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**Recommendations or Selection of Other Investment Advisors**

SFP does not recommend or select other investment advisors for our clients.

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

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**Code of Ethics**

As a fiduciary, SFP and its associates have a duty of utmost good faith to act solely in the best interests of each client. Our clients entrust us with their funds and personal information, which in turn places a high standard on our conduct and integrity. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all our dealings. We also adhere to the Code of Ethics and Professional Responsibility adopted by the CFP® Board of Standards, Inc., and accept the obligation not only to comply with the mandates and requirements of all applicable laws and regulations, but also to take responsibility to act in an ethical and professionally responsible manner in all professional services and activities.

This Code of Ethics does not attempt to identify all possible conflicts of interest, and literal compliance with each of its specific provisions will not shield our firm or its access persons from liability for misconduct that violates a fiduciary duty to our Clients. A summary of the Code of Ethics' Principles is outlined below.

- Integrity - Access persons shall offer and provide professional services with integrity.
- Objectivity - Access persons shall be objective in providing professional services to Clients.
- Competence - Access persons shall provide services to Clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which they are engaged.

- Fairness - Access persons shall perform professional services in a manner that is fair and reasonable to Clients, principals, partners, and employers, and shall disclose conflict(s) of interest in providing such services.
- Confidentiality - Access persons shall not disclose confidential Client information without the specific consent of the Client unless in response to proper legal process, or as required by law.
- Professionalism - Access persons conduct in all matter shall reflect credit of the profession.
- Diligence - Access persons shall act diligently in providing professional services.

We periodically review and amend our Code of Ethics to ensure that it remains current, and we require all firm access persons to attest to their understanding of and adherence to the Code of Ethics at least annually. We will provide a copy of our Code of Ethics to any prospective client upon request.

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#### **Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest**

Neither our firm, its access persons, or any related person is authorized to recommend to a Client or effect a transaction for a Client, involving any security in which our firm or a related person has a material financial interest, such as in the capacity as an underwriter, advisor to the issuer, principal transaction, among others.

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#### **Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest**

Our firm, its access persons, and its related persons may buy or sell securities similar to, or different from, those we recommend to Clients. In an effort to reduce or eliminate certain conflicts of interest, our Code of Ethics may require that we restrict or prohibit access persons' transactions in specific reportable securities. Any exceptions or trading pre-clearance must be approved by the firm's Chief Compliance Officer in advance of the transaction in an account. The firm maintains a copy of access persons' personal securities transactions as required.

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#### **Trading Securities At/Around the Same Time as Client's Securities**

From time to time our firm, its access persons, or its related persons may buy or sell securities for themselves at or around the same time as they buy or sell securities for Clients' account(s). To address this conflict, it is our policy that neither our firm or its access persons shall have priority over Client' account(s) in the purchase or sale of securities.

## **Item 12: Brokerage Practices**

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#### **Factors Used to Select Custodians and/or Broker-Dealers**

SFP does not have any affiliation with any custodian we recommend. Specific custodian recommendations are made to the Client based on their need for such services. We recommend custodians based on reputation and services provided.

In recommending custodians, we have an obligation to seek the “best execution” of transactions in Client accounts. The determinative factor in the analysis of best execution is not the lowest possible commission cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of the custodian’s services. The factors we consider when evaluating a custodian for best execution include, without limitation, the custodian's:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody);
- Capability to execute, clear, and settle trades (buy and sell securities for your account);
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.);
- Breadth and available investment products (stocks, bonds, mutual funds, exchange-traded funds, etc.);
- Availability of investment research and tools that assist us in making investment decisions;
- Quality of services;
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices;
- Reputation, financial strength, security and stability;
- Prior service to us and our clients.

With this in consideration, our firm recommends TD Ameritrade Institutional, an independent and unaffiliated SEC registered broker-dealer and member of the Financial Industry Regulatory Authority (“FINRA”) and the Securities Investor Protection Corporation (“SIPC”). Although Clients may request us to use a custodian of their choosing, we generally recommend that Clients open brokerage accounts with TD Ameritrade Institutional. We are not affiliated with TD Ameritrade Institutional. The Client will ultimately make the final decision of the custodian to be used to hold the Client’s investments by signing the selected custodian’s account opening documents.

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**Research and Other Soft-Dollar Benefits**

We do not have any soft-dollar arrangements with custodians whereby soft-dollar credits, used to purchase products and services, are earned directly in proportion to the amount of commissions paid by the Client. However, as a result of being on their institutional platform, TD Ameritrade Institutional may provide us with certain services that may benefit us.

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**The Custodian and Brokers We Use**

SFP participates in TD Ameritrade's institutional customer service program and SFP may recommend TD Ameritrade to Clients. There is no direct link between SFP's participation in the program and investment advice it gives to its Clients, although SFP 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 account statements and confirmations;
- research related products and tools;
- consulting services;
- access to trading desk serving Spillane Financial Planning, Inc. participants;
- access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts);
- the ability to have advisory fees deducted directly from Client accounts;
- access to an electronic communications network for Client order entry and account information;
- access to mutual funds with no transaction fees and to certain institutional money managers;
- discounts on compliance, marketing, research, technology, and practice management products or services provided to Spillane Financial Planning, Inc. by third party vendors;

Some of the products and services made available by TD Ameritrade through the program may benefit SFP but may not benefit its Clients directly. These products and services may assist SFP in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help SFP manage and further develop its business enterprise.

The benefits received by SFP 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, SFP endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits by SFP or its related persons in and of itself creates a potential conflict of interest and may indirectly influence SFP's choice of TD Ameritrade for custody and brokerage services.

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**Brokerage for Client Referrals**

We receive no referrals from a custodian, broker-dealer or third-party in exchange for using that custodian, broker-dealer or third-party.

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**Clients Directing Which Broker/Dealer/Custodian to Use**

We do recommend a specific custodian for Clients to use, however, Clients may custody their assets at a custodian of their choice. Clients may also direct us to use a specific custodian to execute transactions. By allowing Clients to choose a specific custodian, we may be unable to achieve the most favorable execution of Client transactions and this may cost Clients more money over using a lower-cost custodian.

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**Aggregating (Block) Trading for Multiple Client Accounts**

Investment advisors may elect to purchase or sell the same securities for several clients at approximately the same time when they believe such action may prove advantageous to clients. This process is referred to as aggregating orders, batch trading, or block trading. We do not engage in block trading. It should be noted that implementing trades on a block or aggregate basis may be less expensive for client accounts; however, it is our trading policy to implement all client orders on an individual basis. Therefore, we do not aggregate or “block” client transactions. Considering the types of investments we hold in advisory client accounts, we do not believe Clients are hindered in any way because we trade accounts individually. This is because we develop individualized investment strategies for Clients and holdings will vary. Our strategies are primarily developed for the long-term and minor differences in price execution are not material to our overall investment strategy.

**Item 13: Review of Accounts**

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**Periodic Reviews**

Clients who engage us for investment management services will have their accounts reviewed regularly on a quarterly basis by Richard W. Spillane, Financial Advisor and President/CCO of SFP. The accounts will be reviewed with regards to the Client’s investment policies and risk tolerance levels.

Clients who engage us separately for financial planning or investment consulting services are encouraged to meet with us regularly (at least annually) to address changes in their personal or financial situation so we can update financial plans and recommendations.

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**Triggers for Reviews**

Events that may trigger a special review would be unusual performance, addition or deletions of Client-imposed restrictions, excessive draw-down, volatility in performance, or buy and sell decisions from the firm or per Client’s needs.

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**Review Reports**

Clients will receive trade confirmations from the custodian(s) for each transaction in their account(s) as well as monthly or quarterly statements and annual tax reporting statements from their custodians showing all activity in the account(s), such as receipt of dividends and interest.

We may provide written performance reports and/or holdings reports to investment management Clients on an as needed basis. We urge Clients to compare these reports against the account statements they receive from their custodian.

**Item 14: Client Referrals and Other Compensation**

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**Compensation Received by Spillane Financial Planning, Inc.**

SFP is a fee-only firm that is compensated solely by its Clients. SFP does not receive commissions or other sales-related compensation. Except as mentioned in Item 12 above, we do not receive any economic benefit, directly or indirectly from any third party for advice rendered to our Clients.



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**Client Referrals from Solicitors**

SFP does not, directly or indirectly, compensate any person who is not advisory personnel for Client referrals.

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**Item 15: Custody**

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**In General**

SFP does not hold, directly or indirectly, Client funds or securities, or have authority to obtain possession of Client funds, except in the instance of deducting advisory fees from Client accounts, or where it acts pursuant to a Standard Letter of Authorization ("SLOA"). In all cases, SFP complies with the safekeeping requirement and is therefore exempt from the custody requirements.

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**Fee Deduction**

SFP deducts advisory fees from Client account(s) but is exempt from the regulatory custody requirements because SFP follows these safeguards:

- Client funds and securities are held by an independent qualified custodian.
- The Client must provide written authorization to SFP, permitting us to be paid directly from the Client's accounts held by the qualified custodian.
- The qualified custodian will send at least quarterly statements to the Client showing the amount of funds and each security held at the end of the period, and all transactions and disbursements from the accounts, including the amount of the advisory fee.
- SFP will send an itemized invoice to the Client at the same time it instructs the custodian to debit the advisory fee. Itemization includes the formula used to calculate the fee, the amount of assets under management the fee is based on, and the time period covered by the fee.

We urge Clients to carefully review custodial statements and compare them to account invoices or reports that we may provide to you and notify us of any discrepancies. Clients are responsible for verifying the accuracy of these fees as listed on the custodian's account statements as the custodian does not assume this responsibility. Our invoices or reports may vary from custodial account statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

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**Standing Letter of Authorization**

A Standard Letter of Authorization ("SLOA") are asset transfer authorizations established by a Client with a qualified custodian under which an investment advisor is authorized to withdraw Client funds or securities maintained with a qualified upon the investment advisor's instruction to the qualified custodian.

With a SLOA, a Client can typically authorize first-party and/or third-party transfers. If an investment advisor enters into a SLOA with a client which permits the investment advisor to transfer the Client's funds or securities to a third party, the investment advisor would be deemed to have custody and must comply with the regulatory custody requirements.

SFP is exempt from the regulatory custody requirements because SFP follows the 7 safeguards set out by the SEC:

1. The client provides an instruction to the qualified custodian, in writing, that includes the client's signature, third party's name, and either the third party's address or the third party's account number at a custodian to which the transfer should be directed.
2. The client authorizes the investment advisor, in writing, either on the qualified custodian's form or separately, to direct transfers to the third party either on a specified schedule or from time to time.
3. The client's qualified custodian performs appropriate verification of the instruction, such as a signature review or other method, to verify the client's authorization, and provides a transfer of funds notice to the client promptly after each transfer.
4. The client has the ability to terminate or change the instruction to the client's qualified custodian.
5. The investment advisor has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the client's instruction.
6. The investment advisor maintains records showing that the third party is not a related party of the investment advisor or located at the same address as the investment advisor.
7. The client's qualified custodian sends the client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instructions.

## **Item 16: Investment Discretion**

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### **Discretionary Trading Authority**

For those Client accounts where we provide investment management services, we maintain discretion authority and limited power of attorney to determine the securities and the amount of securities to be bought or sold for a Client's account without having to obtain prior Client approval for each transaction. Investment discretion is explained to clients in detail when an advisory relationship has commenced. At the start of the advisory relationship, the Client will execute a Limited Power of Attorney, which will grant our firm discretion over the account(s). Additionally, the discretionary relationship will be outlined in the Advisory Contract and signed by the Client. Clients may limit our discretion by requesting certain restrictions on investments. However, approval of such requests are at the firm's sole discretion.

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### **Non-Discretionary Trading Authority**

If you enter into non-discretionary arrangements with our firm, we will obtain your approval prior to the execution of any transactions for your account(s). You have an unrestricted right to decline to implement any advice provided by our firm on a non-discretionary basis.

## **Item 17: Voting Client Securities**

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### **Proxy Votes**

We do not vote proxies on behalf of its Clients. Therefore, Clients maintain exclusive responsibility for: (1) voting proxies, and (2) acting on corporate actions pertaining to the Client's investment assets. The Client shall instruct the Client's qualified custodian to forward to the Client copies of all proxies and shareholder communications relating to the Client's investment assets. If the Client would like our opinion on a particular proxy vote, they may contact us at the number listed on the cover of this brochure.

In most cases, you will receive proxy materials directly from the custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless the client has authorized us to contact you by electronic mail, in which case, we would forward any electronic solicitation to vote proxies.

## **Item 18: Financial Information**

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### **Financial Condition**

We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to our Clients, nor have we been the subject of a bankruptcy proceeding.

We do not have custody of client funds or securities, except as disclosed in Item 15 above, or require or solicit prepayment of more than \$500 in fees six month or more in advance.

## **Item 19: Requirements for State-Registered Advisors**

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### **Principal Officers**

Richard W. Spillane is the sole owner and CCO of Spillane Financial Planning, Inc. Information about Richard W. Spillane's education, business background, and outside business activities can be found on his ADV Part 2B, Brochure Supplement attached to this Brochure.

### **Outside Business**

All outside business information, if applicable, of Spillane Financial Planning, Inc. is disclosed in Item 10 of this Brochure.

### **Performance-Based Fees**

Please refer to Item 6 of this Brochure.

### **Material Disciplinary Disclosures**

No management person at SFP has ever been involved in an arbitration claim of any kind or have been found liable in a civil, self-regulatory organization, or administrative proceeding.

### **Material Relationships That Management Persons Have with Issuers of Securities**

Neither SFP nor Richard W. Spillane have any relationship or agreement with issuers of securities.

## Form ADV Part 2B - Brochure Supplement

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### Item 1: Cover

Date: March 15, 2023

Name: **Richard W. Spillane, Individual CRD #2350397**  
President and Chief Compliance Officer

Firm: Spillane Financial Planning, Inc.  
448 E. Silver Street, Lebanon, OH 45036 (principal office)  
726 E. Main Street, Suite F-304, Lebanon, OH 45036 (mailing address)  
Telephone: (339) 298-1570

This brochure supplement provides information about Richard W. Spillane that supplements the Spillane Financial Planning, Inc. brochure. A copy of that brochure precedes this supplement. Please contact Richard W. Spillane, President and Chief Compliance Officer, if the Spillane Financial Planning, Inc. brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Richard W. Spillane is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) which can be found using the identification number 2350397.

The disciplinary history of Spillane Financial Planning, Inc. and its representatives can be obtained from the Ohio Division of Securities and the Massachusetts Securities Division upon request.

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**Item 2: Educational Background and Business Experience**

**Name:** Richard W. Spillane

**Born:** 1956

**Educational Background:**

- University of South Florida, Tampa, FL (Finance, 1979)
- College for Financial Planning (1990)

**Business Experience:**

- 2004 – Present: Spillane Financial Planning, Inc. (Founder, President, CCO)
- 1996 – Present: Richard W. Spillane, CPA (owner, tax and accounting services)
- 1994 – 1995: Moody, Nation & Smith, CPAs (tax and Financial Planning)
- 1993 – 1994: Richard W. Spillane, CPA (owner, tax services)
- 1992 – 1993: CIGNA Financial Advisors (Financial Advisor)
- 1983 – 1992: County of San Diego (Auditor)

**Professional Designations:**

Richard W. Spillane is a Certified Financial Planner (CFP) and a Certified Public Accountant (CPA) registered in Massachusetts and Ohio.

**CERTIFIED FINANCIAL PLANNER™**

CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Earn a bachelor’s degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirements through other qualifying credentials.
- Examination – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual’s ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning scenarios.
- Experience – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.

- Ethics – Satisfy the Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement and agree to be bound by CFP Board’s Code of Ethics and Standards of Conduct (“Code and Standards”) which sets forth the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in the financial planning.
- Ethics – Commit to complying with the CFP Board’s Code of Standards. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP® professional who does not abide by this commitment, but CFP Board does not guarantee a CFP® professional’s services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client..

#### **CERTIFIED PUBLIC ACCOUNTANT (CPA)**

CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (typically a baccalaureate degree and a concentration in accounting, with a 150 credit hour requirement instituted in 1983), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination.

In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two-year period or 120 hours over a three-year period). Additionally, all American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous *Code of Professional Conduct* which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services. The vast majority of state boards of accountancy have adopted the AICPA’s *Code of Professional Conduct* within their state accountancy laws or have created their own.

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#### **Item 3: Disciplinary Information**

Richard W. Spillane has never been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

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**Item 4: Other Business Activities**

Richard W. Spillane operates a CPA firm (d/b/a “**Richard W. Spillane, CPA**”) where he provides tax, accounting, and related services to clients. This activity accounts for approximately 50% of his time.

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**Item 5: Additional Compensation**

- Richard W. Spillane earns fees from his CPA/tax practice (d/b/a (“Richard W. Spillane, CPA”).
- Richard W. Spillane does not receive any economic benefit from any person, company, or organization, in exchange for providing Clients advisory services through Spillane Financial Planning, Inc.

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**Item 6: Supervision**

Richard W. Spillane, as Chief Compliance Officer of Spillane Financial Planning, Inc., supervises the activities of the firm. Richard W. Spillane is bound by and will adhere to the firm’s policies and procedures and Code of Ethics. Clients may contact Richard W. Spillane at the phone number on this Brochure Supplement.

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**Item 7: Requirements for State-Registered Advisors**

Richard W. Spillane has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.