Item 1 - Cover Page



Helping You Secure Your Future™

1337 Hunters Ridge East, Hoffman Estates, IL 60192

(Hours by Appointment Only)

Telephone: 224.353.8567

Email: henry@YourIndependentAdviser.com

Web: <u>www.yourindependentadviser.com</u>

Date of Revision: March 31, 2021

This Brochure provides information about the qualifications and business practices of **Castling Financial Planning, Ltd.**, "**CastlingFP**". If you have any questions about the contents of this Brochure, please contact us via email:

henry@YourIndependentAdviser.com or by phone at 224.353.8567. 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.

Castling Financial Planning, Ltd. is a registered investment adviser. Registration of any Investment Adviser does not imply any level of skill or training. The oral and written

communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about **Castling Financial Planning**, **Ltd.** also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 - Material Changes

On July 28, 2010, the United State Securities and Exchange Commission published "Amendments to Form ADV" which amends the disclosure document that we provide to clients as required by SEC and Illinois Securities Department Rules. This Brochure dated March 31, 2021, is a revision to the document (previously dated March 30, 2020) prepared according to the SEC's and Illinois Securities Department's newer requirements and rules. As such, this Document is materially different in structure and requires certain new information that our original brochure (dated September 12, 2009) did not require.

In the future, this Item will discuss only specific material changes that are made to the Brochure and provide clients with a summary of such changes. We will also reference the date of our last annual update of our brochure. In this revision of the Brochure, we have updated our hourly fee schedule to cover 2021-2022. We have also described how the delivery of our services was transformed during 2020 to being completely virtual, as a result of the COVID19 pandemic. Going forward, we see virtual delivery as one of the ways in which we can maintain our very low fee schedule.

In the past we have offered or delivered information about our qualifications and business practices to clients on at least an annual basis. Pursuant to SEC and Illinois Securities Department Rules, we will ensure that you receive a summary of any material changes to this and subsequent Brochures within 90 days of the close of our business' fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting Henry F. Glodny, Principal, at 224.353.8567 or *henry@YourIndependentAdviser.com*. Our Brochure is also available on our web site: www.YourIndependentAdviser.com, free of charge.

Additional information about **Castling Financial Planning**, **Ltd.** is also available via the SEC's web site <u>www.adviserinfo.sec.gov</u>. The SEC's web site additionally provides information about any persons affiliated with **CastlingFP** who are registered, or are required to be registered, as investment adviser representatives of **CastlingFP**.

Item 3 - Table of Contents

Item 1 – Cover Page	i
Item 2 – Material Changes	ii
Item 3 -Table of Contents	iv
Item 4 – Advisory Business	1
A. Description of Castling Financial Planning, Ltd	1
B. Description of Advisory Services Offered	1
C. Client Tailored Services and Client Imposed Restrictions	2
D. Wrap Fee Programs	2
E. Client Assets under Management	3
Item 5 – Fees and Compensation	3
A. Method of Compensation and Fee Schedule	3
B. Client Payment of Fees	4
C. Additional Client Fees Charged	4
D. Prepayment of Client Fees	4
E. External Compensation For the Sale of Securities to Clients	5
Item 6 – Performance-Based Fees and Side-By-Side Management	5
Item 7 – Types of Clients	5
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss	6
A. Methods of Analysis and Investment Strategies	6
B. Investment Strategy and Method of Analysis Material Risks	7
C. Security Specific Material Risks	7
Item 9 – Disciplinary Information	8
A. Criminal or Civil Actions	8
B. Administrative Enforcement Proceedings	8
C. Self Regulatory Organization Enforcement Proceedings	8
Item 10 – Other Financial Industry Activities and Affiliations	9
A. Broker-Dealer or Representative Registration	9

B. Futures or Commodity Registration	9
C. Material Relationships Maintained by this Advisory Business and Conflicts of Interest1	0
D. Recommendation or Selection of Other Investment Advisers and Conflicts of Interest1	0
Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	0
A. Code of Ethics Description1	0
B. Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest1	1
C. Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest1	2
D. Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest	2
Item 12 – Brokerage Practices1	3
A. Factors Used to Select Broker-Dealers for Client Transactions1	3
B. Aggregating Securities Transactions for Client Accounts1	4
Item 13 – Review of Accounts1	4
A. Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved $\dots 1$	4
B. Review of Client Accounts on Non-Periodic Basis1	4
C. Content of Client Provided Reports and Frequency1	4
Item 14 – Client Referrals and Other Compensation1	5
A. Economic Benefits Provided to the Advisory Firm From External Sources and Conflicts of Interest1	5
B. Advisory Firm Payments for Client Referrals1	5
Item 15 – Custody	5
Item 16 – Investment Discretion	6
Item 17 – Voting Client Securities1	6
Item 18 – Financial Information1	6
Item 19 – Requirements for State-Registered Advisers1	7
A. Principal Executive Officers and Management Persons1	7
B. Other Business Activities Engaged In1	7
C. Performance Based Fee Description1	7
D. Disclosure of Material Facts Related to Arbitration or Disciplinary Actions Involving Management Persons	7

E. Material Relationships Maintained by this Advisory Business or Management Persons With Issuers of		
Securities	17	
Supervised Person Brochure Supplement	18	
Item 1 – Cover Page for:	18	
Item 2 – Educational Background and Business Experience	19	
Item 3 – Disciplinary Information	20	
Item 4 – Other Business Activities	20	
Item 5 – Additional Compensation	21	
Item 6 – Supervision	22	
Item 7 – Requirements for State-Registered Advisers	21	

Item 4 - Advisory Business

A. Description of Castling Financial Planning, Ltd.

Castling Financial Planning, Ltd. (herein abbreviated as "CastlingFP") is an affordable, hourly as needed, fee-only financial planning and investment advisory firm.

CastlingFP provides conflict free analysis and advice. CastlingFP does not sell financial products, provide continuous portfolio management, or effect financial transactions. As discussed in other sections of this Brochure, CastlingFP's focus is on a prospective client's goals and potential, not their initial account balance. Therefore, no minimum asset value is required.

Services are customized to the needs of each client. Overall, CastlingFP splits its time between providing investment advice and performing other financial planning activities for clients.

As a result of the COVID19 pandemic in 2020, CastlingFP transformed itself into delivering all of its services in a completely virtual environment, using tools such as **Microsoft Teams**. Going forward, we see that the use of these tools will allow us to maintain our very low fee schedule. Therefore, we have not raised our fees for the last two years and envision that this will continue into 2022.

Castling Financial Planning, Ltd. is family owned by Henry F. Glodny and Lucja Glodny. It has been in business since 2007.

B. Description of Advisory Services Offered

Welcome to a new approach to financial planning and investment advice! An approach that does not depend upon selling products, that avoids conflicts of interest instead of just "managing" them, that focuses on the size of your future goals and dreams, not just the current size of your portfolio. Finally, an approach that is truly affordable to Middle America.

We hope that you take the time to carefully read over our newly revamped brochure and compare our services to other financial advisers. Our business is advising, not selling. We do not believe in the old style, conflicted approaches of commission based product salespeople, or the heavily inflated fees of asset based advisers. We strongly believe that

financial planning and investment advice need to be delivered in an analytical, data driven, process oriented approach, which is completely focused on service.

Think of trusted services you have received in the past from your accountant or dentist. They were probably not based on selling you a product, charging you a percentage of your income or assets, or making claims about "continuously" monitoring something. You probably paid for these professional services based upon the time and expertise rendered, typically by the hour. If these services were effective and affordable, you more than likely continued to use them, to the extent you needed to. So why can't financial planning and investment advice be offered in the same way?

Really affordable, hourly, fee-only advice and planning is now possible from *Castling Financial Planning, Ltd.*, free from product selling pressures, industry affiliations (one euphemism for conflicts of interest) and regardless of asset size. <u>Less than 1% of financial advisory firms provide affordable services, in this manner</u>. Is it surprising that Middle America's financial future has not seemed very secure, even with hundreds of thousands of "advisors" roaming the streets?

CastlingFP provides advice primarily on mutual funds, exchange traded funds and individual stocks, along with United States Treasury securities, certificates of deposit, variable annuities, the conservative options trading strategy described as "covered call writing" and real estate. The firm also provides general financial planning services, research reports and software tools. CastlingFP does not provide advice on individual corporate or municipal bonds.

C. Client Tailored Services and Client Imposed Restrictions

Our clients are able to secure our services on an hourly, as needed basis. As a result, they are able to focus on the specific financial planning area that interests them or ask us for help in a wide variety of issues involving budgeting, cash flow, investments, retirement planning, basic estate planning, college savings and more. CastlingFP is also a source of unbiased second opinion, about the recommendations clients have received from other financial professionals. A client has no obligation to sign a long term commitment with CastlingFP. This creates a much more flexible situation. CastlingFP does not sell financial products, manage assets, effect transactions, or give legal or tax advice.

D. Wrap Fee Programs

Since CastlingFP does not sell financial products or effect transactions, it does not offer a wrap fee program. CastlingFP strongly feels that advice needs to be de-coupled from

transactions and that teaching clients how to purchase financial products in the most direct manner possible, is virtually always in their best interest.

E. Client Assets under Management

Since CastlingFP does not provide "continuous" monitoring and supervision of client portfolios, this item is not applicable. Instead, we provide advice regarding initial asset allocations, and thereafter, on an intermittent or periodic basis, such as upon client request. This permits us to eliminate all asset management fees and replace them with an hourly fee. Total expense to clients is significantly lower, as compared to conventional approaches. We believe that this is a superior solution for our clients.

Item 5 - Fees and Compensation

A. Method of Compensation and Fee Schedule

CastlingFP maintains both an Hourly Fee Schedule, as well as a Fixed Fee Schedule for specific services, which we refer to as Financial Planning Building Blocks. Any client may choose which billing method is most convenient or cost effective.

For clients choosing hourly fees, a further option breaks down by strictly hourly billing, or a set fee for a twenty-hour "block" of financial planning services, including investment advice. There are no subscription fees, commissions, or asset based fees of any kind. Nor are there any long term commitments.

CastlingFP's Hourly Fee Schedule for 2021-2022 is as follows:

- 1. \$75 per hour for financial planning and investment advisory services, or
- 2. \$995 for a twenty (20) hour block that can be utilized within twelve (12) months, or
- 3. \$129 for up to three (3) hours of telephone and email only, planning and advisory services.

All fees are negotiable. CastlingFP does not accept prepayment of fees in excess of \$500 per client and six (6) or more months in advance. Since CastlingFP does not maintain custody over client assets, there are never any fees deducted from client accounts. CastlingFP does

not act as a general partner for any partnership or trustee for any trust in which our advisory clients are either partners of the partnership or beneficiaries of the trust.

CastlingFP believes that clients who become better stewards of their own personal finances can more effectively help others. CastlingFP would like to encourage charitable giving. Therefore, if any client chooses to purchase a twenty hour block of financial and advisory services, CastlingFP will agree to donate \$100 of its total fee (upon collection of final balance from the client), to any IRS qualified charity of the client's choosing. This donation will be made within thirty days of receipt of the final payment from the client.

B. Client Payment of Fees

CastlingFP accepts a small deposit from clients at the beginning of each engagement, of at least fifty dollars (\$50) and thereafter, bills clients as fees are incurred. Each invoice details the date of service, billable hours in approximately one quarter hour increments, the specific services rendered or analysis done during this time period, along with the applicable hourly rate.

C. Additional Client Fees Charged

CastlingFP does not charge any additional fees. It should be noted that investment products, such as mutual funds, charge a management fee and other expenses. Exchange Traded Funds (ETFs) may incur brokerage costs, in addition to management fees. CastlingFP derives no income from any of these fees, although these fees are charged to shareholder accounts. However, CastlingFP attempts to actively minimize these expenses, on behalf of clients.

D. Prepayment of Client Fees

CastlingFP does not accept prepayment of fees in excess of \$500 per client and six (6) or more months in advance. CastlingFP does accept a small deposit from clients at the beginning of each engagement, of at least fifty dollars (\$50) and thereafter, bills clients as fees are incurred. A client may terminate the advisory agreement before all services have been rendered. In this case, the client is given an immediate refund of any unearned fees paid, for services not yet rendered or analysis not yet performed.

E. External Compensation For the Sale of Securities to Clients

CastlingFP does not sell financial products or effect transactions and therefore, derives no income from any third party. Furthermore, CastlingFP is not affiliated with any third party which produces or sells financial products. Such practices present conflicts of interest. Unlike the vast majority of advisers, CastlingFP seeks to avoid all conflicts of interest. CastlingFP's hourly business model allows us to make all recommendations concerning investment products, based upon the best interests of our clients. CastlingFP strongly believes that no-load mutual funds and other low cost financial products are in our clients best interests.

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

CastlingFP does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Item 7 – Types of Clients

CastlingFP provides investment advice and financial planning services to individuals, including high net worth individuals. However, most of our clients and prospective clients are middle class Americans in both income and net worth. We feel this is an extremely under served market, from the standpoint of affordable, yet conflict free advice. In addition, there is absolutely no minimum dollar value of assets or other conditions for providing service.

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

A. Methods of Analysis and Investment Strategies

CastlingFP would like to remind everyone that investing in securities involves risk of loss that clients should be prepared to bear, especially in the short term. No investment adviser can guarantee a certain rate of return or avoidance of any losses.

CastlingFP's methods of security analysis may include fundamental, cyclical, charting, rolling period and statistical. Our primary emphasis is on using rolling period analysis and statistical methods applied to asset class returns. When recommending individual mutual funds and ETFs, we may analyze the fundamentals of major fund holdings, study market cycles and examine a fund's historical price charts.

Statistical analysis and information technology methods called "data mining" are the primary tools used to determine optimal asset allocation strategies. CastlingFP has created its own Asset Allocation Database (AADB). This proprietary tool has performed nearly 30 billion portfolio calculations at an asset class level. Using it, CastlingFP is able to overcome the short term emphasis and survivorship biases inherent in many other approaches.

No single tool can be relied upon to select investments. CastlingFP uses output from its AADB to select asset allocations exhibiting consistent and robust performance across as many of its rolling time periods, as are possible. Each is then validated through further manual analysis.

CastlingFP views investment advisory as largely an analytical process that is evidence based and data driven. Logic replaces emotion. In this view, emotion is equated with both "fear" and "greed". Instead, CastlingFP does not make investment recommendations without understanding a client's Required Rate of Return. This value is not simply arrived at by asking the client. Instead, it is calculated in a related process that seeks to understand what are the client's goals, resources, time horizon and budget.

This annualized, pre-tax return is net of all fees and expenses. Using the AADB, CastlingFP is able to determine an initial asset allocation to use as part of an Investment Policy Statement (IPS). The probability of reaching the client's goals, as well as the risk involved in a two standard deviation loss, are then calculated. This expected loss forms the client's "Need to take risk", which is part of a three dimensional risk tolerance analysis. It is then evaluated against the client's "Ability to take risk" and their apparent "Willingness to take risk" (the other two dimensions).

CastlingFP does not proceed with recommending an investment portfolio unless all three dimensions of risk tolerance appear to line up in agreement. If this is not the case, an iterative process adjusts the dimensions, along with the appropriate re-calculations and other analysis. The client is both informed and involved in the process.

B. Investment Strategy and Method of Analysis Material Risks

CastlingFP's significant investment strategy involves selecting asset allocations based on statistical and rolling period analysis, as described in the above section. The material risks involved with this strategy center on bearing the systematic risk of investing in securities as a whole (stock market risk), risk associated with a particular asset allocation (primarily investment style risk), as well as the risk of experiencing shorter term losses in time periods that are very much different from longer term (i.e. 20 year) holding periods (time based risk).

CastlingFP is not in favor of frequent trading, nor in recommending high expense mutual funds or ETFs.

While the volatility of any investment portfolio is attempted to be minimized by our approach, some risk will always remain. It is this risk which gives rise to the opportunity that the client may reach their required rate of return and ultimately, their goals.

C. Security Specific Material Risks

For most investors, CastlingFP recommends open end mutual funds and ETFs. While much more diversified than individual stocks, these investment products still carry risks. The material risks to keep in mind are: the systematic risk associated with the market as a whole (stock market risk), the particular risk of investing in any given asset allocation that favors one style over another (investment style risk), the risk of experiencing short term losses (time based risk) and the risk of not achieving one's particular financial objective (goal based risk).

CastlingFP believes that by recommending simpler, lower cost and transparent mutual funds and ETFs, by following evidence based asset allocation strategies, by dollar cost averaging and periodic re-balancing, a client can greatly enhance their chances of achieving their goals. And at every step of the way, without sales loads, commissions, asset management fees, or conflicts of interest, we can help.

For some investors, CastlingFP does recommend the purchase of a few individual stocks of high quality, dividend paying firms, to either buy and hold for their dividends, or as part of a conservative options trading strategy described as "covered call writing".

Item 9 - Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of CastlingFP or the integrity of CastlingFP's management. CastlingFP has no information applicable to this Item. There have been no legal or disciplinary events, material or otherwise, involving CastlingFP, its management or its owners.

A. Criminal or Civil Actions

CastlingFP has had no such actions in its history. There have been no such actions involving a management person, advisor representative or owner.

B. Administrative Enforcement Proceedings

CastlingFP has had no such proceedings in its history. There have been no such proceedings involving a management person, advisor representative or owner.

C. Self Regulatory Organization Enforcement Proceedings

CastlingFP has had no such proceedings in its history. There have been no such proceedings involving a management person, advisor representative or owner.

Item 10 - Other Financial Industry Activities and Affiliations

CastlingFP is an hourly, fee-only financial planning and investment advisory firm. About half of our business deals with financial planning areas outside of giving investment advice. CastlingFP also produces research reports and software tools. These reports and tools are provided to advisory clients, on an as needed basis, at no additional charge.

CastlingFP maintains a strict policy of independence from affiliations with broker-dealers and other financial product or service providers.

In keeping with CastlingFP's strict implementation of a fiduciary standard, it does not maintain any arrangement, oral or in writing, where it is paid cash or receives any non-research services from a non-client, in connection with giving advice to clients. In addition, CastlingFP will not accept research services or any other product or service in exchange for directing client transactions to any broker or mutual fund. CastlingFP will only accept research services and adviser Web site access and content from third party providers, such as The Vanguard Group, Inc., as long as they are offered without obligation of any kind, with respect to any client transactions or securities portfolios.

A. Broker-Dealer or Representative Registration

CastlingFP maintains a strict policy of independence from any affiliations with broker-dealers and other financial product or service providers.

B. Futures or Commodity Registration

CastlingFP maintains a strict policy of independence from any affiliations in the commodities and futures markets.

C. Material Relationships Maintained by this Advisory Business and Conflicts of Interest

CastlingFP maintains a strict policy of independence from affiliations with broker-dealers, other financial product or service providers, investment companies, other investment advisers and financial planners, commodities merchants, accounting firms, law firms, insurance companies, pension consultants, real estate brokers and dealers, and syndicators of limited partnerships.

As a result, we are able to avoid any material conflicts of interest with clients, arising from such affiliations.

D. Recommendation or Selection of Other Investment Advisers and Conflicts of Interest

CastlingFP maintains a strict policy of independence from affiliations with broker-dealers and other financial product or service providers. CastlingFP does not accept compensation, directly or indirectly, from any third parties. CastlingFP does not maintain any business relationships with other advisers or financial product or service providers, that would otherwise create material conflicts of interest.

In addition to shares of mutual funds, the only other securities in which CastlingFP, its Principal(s) and Investment Adviser Representative(s), may buy or sell for itself as well as recommend to advisory clients, are shares of exchange traded funds, individual stocks, call option contracts and United States government securities. CastlingFP believes that ETFs are sufficiently similar to mutual funds, yet believes this disclosure is important.

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

A. Code of Ethics Description

CastlingFP has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of gifts

and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at CastlingFP must acknowledge the terms of the Code of Ethics annually, or as amended.

All supervised persons of the firm, including its Principal(s), are prohibited from recommending any security to a client that does not fit the profile of investment types as listed in Item 4B of this Brochure. Furthermore, no one acting on behalf of CastlingFP is allowed to sell any security or financial product to any client, nor effect any transaction, regardless of whether said person holds an applicable license to engage in that activity.

CastlingFP believes in upholding a strict fiduciary standard that puts the interest of the client first.

No sales commissions, asset management fees or other payments from third parties, are allowed.

CastlingFP believes that a client's goals can best be achieved by the development of a financial plan that integrates multiple areas, including but not exclusive to, investment products. From this universe of products, CastlingFP believes that an extremely small number are worthy of a client's consideration: mainly mutual funds and exchange traded funds. CastlingFP believes that its Principal(s) and Investment Adviser Representative(s) should invest in a manner consistent with the approach advocated to clients. In other words, "eat its own cooking".

Any supervised person is required to submit all personal securities transactions to CastlingFP's Chief Compliance Officer, within 24 hours of the activity taking place. CastlingFP also maintains and enforces written policies designed to prevent the misuse of material non-public information by the firm or associated persons, in accordance with the Investment Advisers Act of 1940, Section 204A.

CastlingFP's clients or prospective clients may request a copy of the firm's Code of Ethics by contacting its Principal and Chief Compliance Officer, Henry F. Glodny.

B. Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest

It is CastlingFP's policy to act in the role of adviser only and not to sell securities or effect any securities transactions for client accounts.

CastlingFP anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which CastlingFP and/or other clients, directly or indirectly, have a position of interest.

It is important to keep in mind that CastlingFP provides advice primarily on mutual funds, exchange traded funds and individual stocks. In addition, advice on United States Treasury securities, certificates of deposit, variable annuities, covered call option strategies and real estate, may also be offered. CastlingFP does not provide advice on individual corporate or municipal bonds.

C. Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest

CastlingFP's employees and Principal(s) are required to follow CastlingFP's Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of CastlingFP may trade for their own accounts in securities which are recommended to CastlingFP's clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees and Principal(s) of CastlingFP will not interfere with making decisions in the best interests of advisory clients. Under the Code certain classes of securities (i.e. mutual funds and exchange traded funds) have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interests of CastlingFP's clients.

In addition, the Code requires pre-clearance of many transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees or Principal(s) to invest in the same securities as clients, there is a possibility that employees or Principal(s) might benefit from market activity by a client in a security held by an employee or Principal(s). Employee and Principal(s) trading is continually monitored under the Code of Ethics to reasonably prevent conflicts of interest between CastlingFP and its clients.

D. Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest

It is CastlingFP's policy to act in the role of adviser only and not to sell securities or effect any securities transactions for client accounts.

CastlingFP provides advice primarily on mutual funds, exchange traded funds and individual stocks. In addition, advice on United States Treasury securities, certificates of deposit, variable annuities, covered call option strategies and real estate, may also be offered. CastlingFP does not provide advice on individual corporate or municipal bonds.

CastlingFP's employees and Principal(s) are required to follow CastlingFP's Code of Ethics. Under the Code, certain classes of securities such as mutual funds and exchange traded funds, have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interests of CastlingFP's clients. Restrictions and monitoring of employee transactions are discussed above in Sections 11A through 11C of this Brochure.

Item 12 - Brokerage Practices

A. Factors Used to Select Broker-Dealers for Client Transactions

It is CastlingFP's policy to act in the role of adviser only and not to sell securities or effect any securities transactions for client accounts.

CastlingFP does not maintain or seek to gain any discretion over client accounts or brokerage selection. Clients are free to choose third party providers and use their existing brokerage accounts, if any. CastlingFP will base its recommendations and advice on what it feels is in the client's best interests. CastlingFP will not maintain any affiliation with any broker-dealer, in keeping with its own policy of no soft dollar arrangements.

CastlingFP does not receive any research or other products or services from a broker-dealer or third party, in connection with client securities transactions ("soft dollar benefits").

In keeping with CastlingFP's implementation of a fiduciary standard, the firm does not maintain any arrangement, oral or in writing, where it is paid cash or receives any non-research services from a non-client, in connection with giving advice to clients. In addition, CastlingFP will not accept research services or any other product or service in exchange for directing client transactions to any broker-dealer or mutual fund. CastlingFP will only accept research services and adviser Web site access and content from third party providers, such as *The Vanguard Group, Inc.*, as long as they are offered without obligation of any kind, with respect to any client transactions or securities portfolios.

B. Aggregating Securities Transactions for Client Accounts

It is CastlingFP's policy to act in the role of adviser only and not to sell securities or effect any securities transactions for client accounts. As a result, CastlingFP is not involved in aggregating the purchase or sale of any securities for any client accounts.

Clients are free to choose third party providers and use their existing brokerage accounts, if any. If the use of an existing brokerage or otherwise client directed brokerage would result in less than the most favorable execution of a recommendation made by CastlingFP (including increased transaction costs), CastlingFP will make every attempt to inform the client about its opinion of the proposed transaction. Since CastlingFP does not have discretion over client accounts, it will be up to the client to determine whether to proceed with executing each recommendation through their existing broker-dealer or mutual fund account.

Item 13 - Review of Accounts

A. Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved

CastlingFP is an hourly, fee-only financial planning and investment advisory firm that does not engage in continuous portfolio supervision. Reviews of client investment accounts, including their frequency and level of review, depend upon the desires of each individual client. There is no predefined schedule, thus providing more flexibility and greater economy for the client. The Principal, Henry F. Glodny, performs all reviews.

B. Review of Client Accounts on Non-Periodic Basis

The triggering factor for any portfolio review is the client's wishes. Clients are reminded that it remains their responsibility to inform the adviser of any changes in their goals or personal financial situation.

C. Content of Client Provided Reports and Frequency

Due to its hourly, as-needed, advisory model for client interactions, CastlingFP does not publish regular reports to clients on their accounts. Instead, specialized reports and

analysis are developed based upon the unique needs of each client and delivered as part of the hourly, as needed, advisory model. All reports are written.

Item 14 - Client Referrals and Other Compensation

A. Economic Benefits Provided to the Advisory Firm From External Sources and Conflicts of Interest

CastlingFP does not maintain any arrangements, oral or in writing, where it is paid cash or receives any non-research services from anyone, in connection with giving advice to clients. In addition, CastlingFP will not accept research services or any other product or service in exchange for directing client transactions to any broker or mutual fund. CastlingFP will only accept research services and adviser Web site access and content from third party providers, such as *The Vanguard Group, Inc.*, as long as they are offered without obligation of any kind, with respect to client transactions or securities portfolios.

B. Advisory Firm Payments for Client Referrals

CastlingFP does not maintain any arrangements, oral or in writing, where it compensates any person for client referrals directly in cash. CastlingFP does maintain an arrangement where it can offer anyone a credit of two hours of future, no cost financial planning services from CastlingFP, if they refer a new client to the firm. This Referral Arrangement is a written agreement entered into by all three parties: the new prospective client, the referring client and CastlingFP. The new prospective client does not pay any additional or higher fees as a result of the referral.

Item 15 - Custody

As a matter of firm policy and practice, CastlingFP does not have custody of client funds or securities and does not seek custody. As a result, CastlingFP does not generate account statements for clients. Clients are urged to carefully review the account statements they

receive from their qualified custodians. CastlingFP does not withdraw advisory fees directly from any client accounts.

CastlingFP does not require (or accept) the prepayment of fees of more than \$500 per client and for six months or more in advance.

Item 16 - Investment Discretion

As a matter of firm policy and practice, CastlingFP does not accept discretionary authority to manage securities accounts on behalf of clients. This means that CastlingFP does not have discretionary authority to determine what securities are to be bought or sold, or in what amount, nor what broker or dealer is to be used, nor what (if any) commission rates are to be paid to a broker or dealer, in connection with a client's account. CastlingFP acts in a pure advisory role, performing analysis and making detailed recommendations, in the client's best interest.

Item 17 - Voting Client Securities

As a matter of firm policy and practice, CastlingFP does not have any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. CastlingFP may provide advice to clients regarding the clients' voting of proxies.

Item 18 - Financial Information

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about the firm's financial condition. CastlingFP is an hourly as needed, fee-only financial planning and investment advisory firm, that does not require (or accept) the prepayment of fees of more than \$500 per client and for six months or more in advance. CastlingFP does not have custody of client funds or securities and

does not seek custody or discretion over client accounts. CastlingFP has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

Item 19 - Requirements for State-Registered Advisers

A. Principal Executive Officers and Management Persons

CastlingFP's Investment Adviser Principal and Chief Compliance Officer is Henry F. Glodny. He is currently the only supervised person of the firm and is co-owner. Additional information about Mr. Glodny is contained in the Part 2B of Form ADV Brochure Supplement which has been stored electronically immediately after this Part 2A Brochure.

B. Other Business Activities Engaged In

CastlingFP is an hourly, fee-only financial planning and investment advisory firm. About half of CastlingFP's business deals with financial planning areas outside of giving investment advice. The firm also produces research reports and software tools.

C. Performance Based Fee Description

As a matter of firm policy and practice, CastlingFP does not charge any performance based fees. Prospective clients are cautioned that any performance based compensation may create an incentive for any adviser to recommend an investment that may carry a higher degree of risk to the client.

D. Disclosure of Material Facts Related to Arbitration or Disciplinary Actions Involving Management Persons

Neither CastlingFP nor its Principal, Henry F. Glodny, have any disclosures regarding arbitration or disciplinary actions of any kind.

E. Material Relationships Maintained by this Advisory Business or Management Persons With Issuers of Securities

CastlingFP, its Principal, all management persons and all owners, maintain a strict policy of independence from affiliations with issuers of securities.

Part 2B of Form ADV

Supervised Person Brochure Supplement

Item 1 - Cover Page for:

Henry F. Glodny

1337 Hunters Ridge East

Hoffman Estates, Illinois 60192

Telephone: 224.353.8567

Principal and Investment Adviser Representative for:

Castling Financial Planning, Ltd.

(located at the same business address and with the same telephone number as above)

Date of Revision: March 31, 2021

This brochure supplement provides information about Henry F. Glodny that supplements the **Castling Financial Planning, Ltd.** "**CastlingFP**" brochure. You should have received a copy of that brochure. It is electronically stored together with this supplement in a single PDF file. Please contact us via email: *henry@YourIndependentAdviser.com* or by phone

at 224.353.8567, if you did not receive **CastlingFP's** brochure or if you have any questions about the contents of this supplement.

Additional information about Henry F. Glodny and **Castling Financial Planning, Ltd.** is available on the SEC's website at **www.adviserinfo.sec.gov**.

Item 2 - Educational Background and Business Experience

CastlingFP's Investment Adviser Principal and Chief Compliance Officer is Henry F. Glodny.

Year of Birth: 1959

Formal Education and Professional Designations Earned or in Process:

Successfully achieved the passing standard (on the first attempt) for the CFP® Certification examination, established by the Certified Financial Planner Board of Standards, in November, 2016.

Mr. Glodny is currently working towards the Certified Financial Planner CFP® Professional designation by completing the remainder of the work experience requirement, at CastlingFP. It should be noted that Mr. Glodny and CastlingFP have committed to a strict fiduciary standard and Code of Ethics that surpasses even the current requirements of the CFP Board.

Graduated in 2016 from the CFP® Professional Education Program at the College for Financial Planning.

Chartered Retirement Plans SpecialistSM, 2014, designation earned from the College for Financial Planning.



Series 65 Investment Adviser Law Exam, Passed, 2007.

De Paul University, Certificate in Financial Planning, 2006.

Roosevelt University, Master of Science in Information Systems, 1990.

University of Illinois at Chicago, Master of Business Administration, 1984.

University of Illinois at Chicago, Bachelor of Science in Engineering Management, 1982.

Business Background:

Principal, Castling Financial Planning, Ltd., 2007 - Present.

Principal, **Terra Nimbus Systems, Inc.** 2012 - Present.

Principal, **PalatineCondoForRent.com**, 2008 - Present.

Manager, Real Return Investors, LLC, 2013 - Present.

IT Business Systems Analyst, **Motorola, Inc.** and **Motorola Solutions, Inc.** 1984 - 2012.

Mr. Glodny has over thirty years of personal investment experience. This also includes experience in the use of quantitative techniques and information technology, as used in investment analysis.

Item 3 - Disciplinary Information

There have not been any legal or disciplinary events of any kind, involving Henry F. Glodny. No such events are pending and there are no further disclosures involving Mr. Glodny.

Item 4 - Other Business Activities

Mr. Glodny is not engaged in any other investment services related business or occupation.

Mr. Glodny is currently involved as principal of Terra Nimbus Systems, Inc., an information technology services consulting business, which may provide software tools to CastlingFP. This activity may involve up to 10 percent of his time, although it has been inactive during 2013-2020.

As manager of Real Return Investors, LLC, Mr. Glodny self directs the alternative investments inside one of his IRAs. This activity may involve up to 10 percent of his time. This LLC's sole member is Mr. Glodny's self-directed IRA. The LLC provides no services of

any kind to any person or entity and does not hold the assets of any other person or entity. It has no affiliation to CastlingFP.

Mr. Glodny owns and manages multiple rental properties, although this is not a significant source of his income. It may involve up to 20 percent of his time. As part of this activity, he is a non-resident board member of the community association: Preserve of Palatine Condominiums Association (POPCA).

Mr . Glodny also serves as the chairman of the finance council for St. John the Evangelist Catholic Church in Streamwood, Illinois. This activity may involve up to 5 percent of his time.

Item 5 – Additional Compensation

Mr. Glodny does not receive compensation or other economic benefits from anyone, who is not a client, for providing advisory services to clients. This is in keeping with CastlingFP's Code of Ethics.

Item 6 – Supervision

Mr. Glodny is CastlingFP's Investment Adviser Principal and Chief Compliance Officer. He does not have a supervisor at the firm.

Item 7 - Requirements for State-Registered Advisers

Mr. Glodny has never been involved in any disciplinary events, arbitration claims, civil proceedings, self-regulatory organization or administrative proceedings, of any kind. No such events, claims or administrative proceedings are pending. Mr. Glodny has never been the subject of any bankruptcy petition.