

Firm Brochure – Part 2A of Form ADV

Dalton Financial LLC

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This brochure provides information about the qualifications and business practices of Dalton Financial LLC. If you have questions about the contents of this brochure, please contact us at (704) 907-0315 or by email at bob@daltonfin.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state authority.

Additional information about Dalton Financial LLC is available on the SEC website at

www.adviserinfo.sec.gov

January 14, 2024

Material Changes

Annual Update

The Material Changes section of this brochure will be updated annually when material changes occur since the previous release of the Firm Brochure. Clients will be provided with a summary of new or updated material information within 120 days of the close of our fiscal year. In addition, we may make minor stylistic changes between annual revisions for improved clarity.

Material Changes since the Last Update

Changes since the ADV Part 2 dated September 1, 2023 are listed here:

There have been no material changes.

Full Brochure Available

Whenever you would like to receive a complete copy of our most recent ADV Part 2 Brochure, please contact us by telephone at (704) 907-0315 or email us at bob@daltonfin.com.

Table of Contents

Cover..... 1

Material Changes 2

 Annual Update 2

 Material Changes since the Last Update 2

 Full Brochure Available 2

Table of Contents 3

Advisory Business 6

 Firm Description 6

 Principal Owners 6

 Types of Advisory Services 7

 Types of Agreements 7

 Advisory Service Agreement 7

 Hourly Planning Engagements 8

 Termination of Agreement 8

Fees and Compensation 8

 Description 9

 Fee Billing 9

 Other Fees 9

 Past Due Accounts and Termination of Agreement 10

Types of Clients 10

 Description 10

 Account Minimums 10

Methods of Analysis, Investment Strategies and Risk of Loss 10

 Methods of Analysis 10

 Investment Strategies 11

 Risk of Loss 11

Disciplinary Information 11

Legal and Disciplinary	11
Other Financial Industry Activities and Affiliations	11
Financial Industry Activities	11
Affiliations	11
Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	12
Code of Ethics	12
Participation or interest in Client Transactions	12
Personal Trading	12
Brokerage Practices	12
Selecting Brokerage Firms	12
Best Execution	13
Soft Dollars	13
Order Aggregation	13
Review of Accounts	13
Periodic Reviews	13
Review Triggers	13
Regular Reports	13
Client Referrals and Other Compensation	14
Incoming Referrals	14
Referrals to Others	14
Custody	14
Account Statements	14
Investment Discretion	14
Discretionary Authority for Trading	14
Limited Power of Attorney	15
Voting Client Securities	15
Proxy Votes	15
Financial Information	15

Financial Condition	15
Business Continuity Plan	15
General	15
Disasters	15
Alternate Offices	15
Loss of Key Personnel	16
Information Security Program	16
Information Security	16
Privacy Notice	16
Brochure Supplement (Part 2B of Form ADV)	17
Education and Standards	17
Robert Dalton Higgins,	18

Advisory Business

Firm Description

Dalton Financial LLC was founded in 2013 by Robert Dalton Higgins in Charlotte, NC, to provide investment management and financial planning advisory services.

Dalton Financial LLC provides personal financial planning and investment management primarily to individuals and their families. Dalton Financial LLC consults with clients to define financial objectives and develop strategies for reaching their objectives. Issues that are specific to the concerns of that client may include identifying financial concerns, cash flow, spending and budget management, tax planning, risk exposure, investment management as well as education, retirement, estate, charitable goal and special needs planning and family business succession issues, fringe benefits, company sponsored retirement plans, and/or other areas.

Dalton Financial LLC is a fee-only financial planning and investment management firm. The firm does not receive any compensation from the acquisition of any financial investment products or insurance. No commissions in any form are accepted. No referral fees are paid or accepted. No benefits are received from custodians/broker-dealers based on client securities transactions (so called "soft dollar benefits").

Assets under the direct management of Dalton Financial LLC are held by independent custodians in the client's name. Dalton Financial LLC does not act as a custodian of client assets. The client always maintains complete control of their assets.

Dalton Financial LLC places trades for clients under a limited power of attorney granted by the client including with those qualified plan custodians where the client has authorized Dalton Financial LLC to trade on their behalf. At no time does Dalton Financial LLC ever take custody of assets.

Other professionals (e.g., lawyers, accountants, personal financial assistants, insurance agents, realtors, nursing or care managers, etc.) may be recommended and involved as needed. Their fees are paid directly by the client. Conflicts of interest will be disclosed and managed for the client's benefit.

An initial meeting, which may be made by calling (704) 907-0315, is free of charge and is considered an exploratory interview to determine whether an individual's financial planning and investment management issues suggest a good potential fit with Dalton Financial LLC's advisory capabilities.

Principal Owners

Robert Dalton Higgins is the sole owner and Managing Member of Dalton Financial LLC.

Types of Advisory Services

Dalton Financial LLC provides on-going financial planning services including investment management to help our clients achieve their financial objectives by integrating the financial planning and investment management service process.

In performing its services, Dalton Financial LLC does not typically verify the information received from the client or from the client's other professionals. Each client is advised that it remains their responsibility to promptly notify Dalton Financial LLC when there is any change in their financial situation or objectives to review and possibly revise prior recommendations. As of January 14, 2024, Dalton Financial LLC manages approximately \$23,000,000 in assets for approximately 30 clients over 81 accounts. Dalton Financial LLC manages all accounts on a discretionary basis and all assets are held under a discretionary agreement.

Tailored Relationships

Advisory services are tailored to the individual needs of clients. Client goals and objectives are defined through meetings, correspondence, calls, email, and questionnaires. An investment policy summary may be used to better define investment risk and return parameters and expectations. Clients may request restrictions on the use of certain securities or types of securities only by written agreement with Dalton Financial LLC.

Types of Agreements

The following agreements define the typical client relationships. Client Agreements may not be assigned by us without client consent.

Advisory Service Agreement

The client's financial affairs, which may include those of their children, are reviewed, measurable goals are discussed and the means to achieve those goals are defined. As goals and objectives change over time, recommendations are made and implemented on an ongoing basis.

The scope of work and fee for a Planning Service Agreement is provided to the client in writing prior to the start of the engagement. A Planning Agreement may include services prioritized appropriately to each client, such as cash flows, insurance review, education, retirement and estate planning and investment analysis as well as recommended implementation steps within each area. Investment management services are integrated into on-going planning services with the Investment Advisory Agreement.

The fee for financial planning is provided in writing separately from the on-going investment management fees shown below. The initial financial planning fee is estimated depending upon the complexity of the client's circumstances and the scope of the planning services needed. The minimum fee is \$500 and is payable

in advance. If the fee is greater than \$1,000, half is due with the engagement letter. The balance is due upon the initial plan's completion but no later than 6 months after engagement. Other terms may be specified in the engagement letter.

The Investment Advisory Agreement fee is collected quarterly in advance. It is based on a percentage of managed assets according to the following schedule:

- 1.20% on the first \$500,000;
- 1.00% on the next \$1,500,000;
- 0.75% on the next \$3,000,000;
- 0.50% above \$5,000,000

Fees are negotiable above \$5,000,000 and may include a retainer fee arrangement based upon some combination of assets under management, net worth and income. Minimum annual investment management fees of \$1250 may apply but are negotiable depending upon facts and circumstances. Current client fee schedules may exist where the fees are higher or lower than the schedule shown above.

Hourly Planning Engagements

Dalton Financial LLC may perform hourly planning or investment analysis services at the hourly rate of \$200/hour. The rate is negotiable and may take into consideration circumstances such as other fees paid by the client for assets under management or a financial planning relationship.

Termination of Agreement

Although the Advisory Service Agreement is an ongoing agreement, the client or Dalton Financial LLC may terminate an Advisory or Investment Management Agreement by written notice to the other party. Termination will be effective at the end of the month following notice to the other party. At termination, fees will be billed by Dalton Financial LLC on a pro rata basis for the portion of the quarter completed. The portfolio value at the completion of the prior full billing quarter is typically used as the basis for the Investment Management fee computation.

If the client made an advance payment, Dalton Financial LLC will refund any unearned portion of that advance payment.

Fees and Compensation

Description

Dalton Financial LLC bases its fees on a percentage of assets under management, hourly billing, flat fee, or any combination of these based on circumstances. The first year's financial planning fees are based on the

complexity of the client's facts and circumstances and are quoted in writing before the engagement. Financial planning fees for the second year and thereafter are quoted in writing with confirmation of the scope of the planning.

Fees are negotiable above \$5,000,000 as described in the Advisory Agreement.

Fee Billing

The initial Account Fee for new accounts funded during the first half of a billing quarter is due when the account is funded and is pro-rated for the remainder of the quarter. The fee is based on the initial value of the account on the close of business on the date it is funded. New accounts funded during the second half of a quarter will be billed at the beginning of the quarter following execution of this Agreement and will include the prorated fee for the initial quarter in addition to the standard quarterly fee for the upcoming quarter. Subsequent Account Fee payments are due and will be assessed at the beginning of each quarter based on the value of the Account assets under management as of the close of business on the last business day of the preceding quarter. Payment may be made by check upon presentation of the invoice, but fees are usually deducted from a designated client account to facilitate billing. The client must consent in advance to direct debiting of their investment account.

Fees for financial plans are billed one-half at engagement and the balance after completion of the planning or six months, whichever comes first. Hourly engagements are billable either as incurred or upon delivery of findings or recommendation.

Annual flat fees are billed quarterly, semi-annually (or annually if the amount is less than \$500) in arrears, in quarterly increments, subject to a minimum per invoice of \$100. In cases where the minimum invoice applies, fees may be billed in arrears on a schedule specified in an engagement letter.

Other Fees

Custodians may charge transaction fees on purchases or sales of mutual funds, exchange-traded funds and other types of client securities. These transaction charges are usually small and incidental to the purchase or sale of a security. In some cases, custodians also charge monthly, quarterly or annual custody fees. Custodial fees by the custodian are disclosed to clients where Shareholder Services Group or another custodial arrangement is recommended.

Mutual funds and exchange traded funds also charge a separate fee for their services. Their management fee is included in the fund's expense ratio. Mutual fund fees also include transaction charges for the purchase or sale of securities within the fund and they may charge other fees as disclosed in their fund prospectus. These fees are in addition to the fees paid by the client to Dalton Financial LLC and/or to the custodian.

Dalton Financial LLC, in its sole discretion, may waive its minimum fee and/or

charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations, etc.).

Dalton Financial LLC does not offer a performance-based fee structure.

Past-Due Accounts and Termination of Agreement

Dalton Financial LLC reserves the right to suspend work on any account that is more than 60 days overdue. Dalton Financial LLC also reserves the right to terminate any financial planning engagement where a client is not providing relevant information as requested if in the sole judgment of Dalton Financial LLC, it is prevented as a result from having the proper foundation from which to offer advice. Clients may also terminate their agreement at any time by providing written notice. Terminating clients will receive an itemized invoice for completed work. An invoice for work performed is due within 30 days. Any unused portion of fees already collected will be refunded within 30 days.

Types of Clients

Description

Dalton Financial LLC generally provides investment advice to individuals, families and their related businesses, trusts and estates. Client relationships vary both in scope and length of service.

Account Minimums

Dalton Financial LLC does not require a specific minimum asset value to open an account but instead evaluates historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, etc. Other exceptions will apply to employees of Dalton Financial LLC and their relatives, or relatives of existing clients. However, minimum fees may make an account impractical or unreasonably expensive and would therefore be declined.

Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

Security analysis methods employed by Dalton Financial LLC includes fundamental analysis of underlying individual securities.

Information and conjecture about market conditions and investment environments comes from public sources and financial publications such as the Wall Street Journal, Bloomberg Business Week, Barrons, Morningstar, etc.

Dalton Financial LLC may use other sources of information such as proprietary investment statistical services (Morningstar), the publications, opinion and conference calls from mutual fund companies, subscription newsletter services, banks' economic research departments, the Federal Reserve, and other research resources available across the internet.

Investment Strategies

The primary investment strategy employed by Dalton Financial LLC for client accounts is strategic asset allocation combining a passive and actively managed approach over a three to five-year time horizon. Therefore, index-based ETF's and low-cost mutual funds are used as core investments. Actively managed funds may be used where a better risk-reward opportunity potential is judged to justify the additional costs of active management. Asset allocated portfolios are globally diversified to moderate risk and better match risk and return expectations to specific client circumstances and objectives. Individual securities may be incorporated to magnify exposure to growth or income-based objectives.

The investment strategy for a specific client is based on that client's facts, circumstances, cash flow and liquidity objectives, risk tolerance and capacity as stated by them during meetings and by correspondence. The client may change their objectives at any time.

Risk of Loss

All investments pose risks which are borne solely by the investor. Our investment approach is to try to keep the risk of loss harnessed to the return expectations. Nevertheless, all investors face some or all risks that investing may pose such as Interest-rate Risk, Market Risk, Inflation Risk, Currency Risk, Reinvestment Risk, Business Risk, Liquidity Risk and Financial Risk among others.

Disciplinary Information

Legal and Disciplinary

Neither Dalton Financial LLC nor its employees have been involved in legal or disciplinary events related to past or present investment clients.

Other Financial Industry Activities and Affiliations

Financial Industry Activities

Dalton Financial LLC is not engaged in any other financial business activities.

Affiliations

Dalton Financial LLC does not have arrangements that are material to its advisory or its clients with any related person.

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

Code of Ethics

The employees of Dalton Financial LLC have committed to a Code of Ethics and Fiduciary Oath as outlined by the Certified Financial Planner Board of Standards and Code of Ethics. The key elements are: Integrity, Objectivity, Competence, Fairness, Confidentiality, and Professionalism. The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

Participation or Interest in Client Transactions

Dalton Financial LLC and its employees may buy or sell securities and/or funds that are also held by clients. Employees may not trade their own securities ahead of planned client trades. Employees comply with the provisions of the Dalton Financial LLC Policies and Procedures Manual.

Personal Trading

The Chief Compliance Officer of Dalton Financial LLC is Robert Dalton Higgins. He reviews employee trades each quarter but given that most trades are mutual funds and ETF's, and that the amounts invested are much smaller than would be required to influence any fund's results, the practical result is that Dalton Financial LLC employees' trades are not large enough to be material nor affect any securities market or its prices.

Brokerage Practices

Selecting Brokerage Firms

Dalton Financial LLC does not have any affiliation with a brokerage firm. Our advice is not influenced by a broker's oversight and supervision.

Custodian selections are made for clients based upon their need for such services. Dalton Financial LLC selects custodians based on the integrity and financial strength and responsibility of the firm, their execution of orders at competitive, reasonable rates and the quality of their service to us and our clients.

Dalton Financial LLC contracts with discount brokerage firms and trust companies (qualified custodians). Dalton Financial LLC does not receive fees or commissions from any of these arrangements, although Dalton Financial LLC may benefit from electronic delivery of client information, electronic trading

platforms and other services provided by custodians for the benefit of clients. Dalton Financial LLC may also benefit from other ancillary services provided by custodians, such as market and fund research, continuing education, and practice management advice. These benefits are standard in advisory relationships with custodians as Schwab, Shareholders Service Group, Altruist Financial LLC, Trade PMR, ScottTrade or Fidelity and are not in return for client recommendations or transactions.

Best Execution

Dalton Financial LLC reviews trade execution practices at our custodians annually, relative to other similar custodians based upon available information.

Trading fees charged by the custodians are also reviewed on an annual basis. Our recommended custodians may not have the lowest fees or costs because in our judgment, other factors such as financial stability, technical resources and client service are at least as important. Dalton Financial LLC does not receive any portion of the trading fees.

Soft Dollars

Dalton Financial LLC receives no “soft dollar” benefits from any custodian.

Order Aggregation

Most grouping of trades with mutual funds does not result in any client benefit other than gaining access to lower cost “institutional” share class pricing for our clients. As a general practice, Dalton Financial LLC does not aggregate trades for our clients. Trading is done on an account-by-account basis in the context of the client’s re-balancing and individual portfolio needs.

Review of Accounts

Periodic Reviews

Account reviews with clients are performed periodically by Robert Dalton Higgins, Managing Member. The frequency of reviews is individually determined with each client according to their preference. Account reviews are typically performed more frequently when market conditions dictate.

Review Triggers

A review may be triggered by a client request, changes in market conditions or tax laws, new investment information, or changes in a client's own situation.

Regular Reports

Clients receive custodian statements directly from the custodian. Periodic communications are provided by us to clients about their portfolios. They may include a portfolio statement, a net-of-fees performance summary for selected periods and an investment markets and/or planning commentary.

Client Referrals and Other Compensation

Incoming Referrals

Dalton Financial LLC is gratified to have received introductions to new clients from our existing clients over the years. Whether from current clients, estate planning attorneys, accountants, employees, personal friends of employees or others, however, Dalton Financial LLC does not compensate anyone as an inducement for any referrals.

Referrals to Others

Dalton Financial LLC also does not accept referral fees or any form of remuneration from other professionals when someone is referred to them.

Custody

Account Statements

All assets are held by qualified custodians who, independent of Dalton Financial LLC, provide account statements at least quarterly directly to clients at their address of record. Advisor is not affiliated with a custodian and a custodian does not supervise or otherwise influence our activities or advice.

Clients are urged to compare the account statements received directly from their custodians to the statements and reports provided by Dalton Financial LLC for possible discrepancies. Custodians do not verify fee calculations and clients are advised to verify that amounts deducted from accounts are accurate. Errors will be corrected immediately upon discovery with a correcting charge, refund or credit as appropriate.

Investment Discretion

Discretionary Authority for Trading

Dalton Financial LLC accepts discretionary authority to manage securities accounts on behalf of clients. Dalton Financial LLC therefore has the authority to determine the securities to be bought or sold, the amount of the securities to be bought or sold and when, without obtaining specific client consent beforehand.

Discretionary trading authority facilitates placing trades across client accounts so that the investment strategy agreed to by the client may be promptly implemented and transaction costs minimized.

By their agreement with the custodian, the client approves the custodian to be used and the transaction fees to be paid to the custodian. Dalton Financial LLC does not receive any portion of any fees paid by the client to the custodian.

Limited Power of Attorney

Clients sign a limited power of attorney to give Dalton Financial LLC discretionary authority. The limited power of attorney is included in the qualified custodian's account application and in the Client Agreement provided by Dalton Financial LLC. For custodial accounts not held with our primary custodians, clients may grant Dalton Financial LLC a limited power of attorney by signing the Client Agreement which authorizes internet access to those held-away accounts to act on the client's behalf with that limited discretionary authority.

Voting Client Securities

Proxy Votes

Dalton Financial LLC does not vote proxies on securities. Clients may wish to vote their own proxies, but they are also free to ignore proxy vote solicitations.

Financial Information

Financial Condition

Dalton Financial LLC does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients. A balance sheet is not required to be provided because Dalton Financial LLC has never, nor does it intend to serve as a custodian for client funds or securities and does not require prepayment of fees more than six months in advance.

Business Continuity Plan

General

Dalton Financial LLC has a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications or services.

Disasters

The Business Continuity Plan covers natural disasters such as snowstorms, hurricanes, tornadoes, and flooding. The Plan covers man-made disasters such as loss of electrical power, loss of water pressure, fire, nuclear emergency, chemical event, Internet outage, etc. Electronic files are backed up continuously and archived off-site.

Alternate Offices

Alternate offices and mobile technology are identified and in place to support ongoing operations in the event the main office is unavailable. It is our intention to contact all clients within five days of a disaster that dictates moving our office to an alternate location.

Loss of Key Personnel

Dalton Financial LLC is seeking to formulate a Business Continuation Agreement with another financial advisory firm to support Dalton Financial LLC in the event of Robert Dalton Higgins' serious disability or death.

Information Security Program

Information Security

Dalton Financial LLC maintains an information security program to reduce the risk that your personal and confidential information may be breached.

Privacy Notice

Dalton Financial LLC is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us.

The categories of nonpublic information that we collect from you may include information about your personal finances, information about your health to the extent that it is needed for the financial planning process. We use this information in the process of our work to help you meet your financial goals.

With client permission, we disclose limited information to attorneys, accountants and other professional service providers with whom the client has established a relationship. Clients may opt out from our sharing information with any of these non-affiliated third parties by notifying us at any time at (704) 907-0315 or bob@daltonfin.com or in person.

With your permission, we share a limited amount of information about Clients with our custodian to execute securities transactions on their behalf.

We maintain a secure office to ensure that Client information is not placed at unreasonable risk. We employ a firewall barrier, secure data encryption techniques and authentication procedures in our computer environment.

We do not provide personal information to mailing list vendors or solicitors. We require strict confidentiality in our agreements with unaffiliated third parties that require access to personal information, including financial service companies, consultants, and auditors. Federal and state securities regulators may review our Company records and client personal records as permitted by law.

Personally identifiable information will be maintained while still a client, and for the required period thereafter that records are required to be maintained by federal and state securities laws. After that time, information may be destroyed.

We will notify clients in advance if our privacy policy is expected to change.

We will provide Clients with this written *Privacy Notice* annually.

Dalton Financial LLC Brochure Supplement (Part 2B of Form ADV)

Education and Business Standards

Dalton Financial LLC requires that advisors in its employ have a bachelor's degree and further coursework demonstrating knowledge of financial planning, retirement plans and tax planning.

Dalton Financial LLC requires that any employee whose function involves determining or giving investment advice to clients must be a graduate of a four-year college. In addition, they must:

1. Have at least five years of experience in insurance, investments, accounting, or financial planning;
2. Be an attorney, ERISA specialist, have earned, be holding or be pursuing one of the following designations: Certified Financial Planner™ (CFP®), Certified Public Accountant (CPA), Certified Financial Analyst (CFA) or Chartered Financial Consultant (ChFC®) if engaged with clients requiring advanced planning;
3. Subscribe to the Code of Ethics of the National Association of Personal Financial Advisers (NAPFA) and the CFP® Board of Standards;
4. Be properly certificated or licensed for all advisory activities in which they are engaged.

Robert Dalton Higgins

- Date of birth: 1956

Educational Background:

- B.A. Economics. The University of North Carolina at Chapel Hill 1974 - 1978
- MBA, Babcock Graduate School of Management, Wake Forest University, 1978 – 1980
- Previously active certifications include CFP®, CLU, ChFC, and Certified Management Accountant (CMA), each for more than 20 years.

Business Experience:

- 1980 – 1985 Business Planning/Financial Analyst, GTE Corporation. Analyst in emerging internet and cellular telephone technologies
- 1986 – 1987 Senior Financial Analyst, Compaq Computer Corporation. Reconciled cash management model to general ledger and managed financial reporting and forecast for two divisions
- 1987 – 1991 Manager of Economic Planning for DowBrands, Inc., Consumer Products division of Dow Chemical
- 1992 – 1993 Senior Planning Analyst, Sandoz Chemical, Charlotte, NC
- 1994 – 2000 Financial Representative, Northwestern Mutual Life, Charlotte, NC, financial planning, advanced estate planning, employee benefits, life insurance and investments
- 2000 – 2003 Investment Advisor Representative, First Global Financial, Charlotte and Raleigh, NC, established financial services practice for CPA firm and managed private financial planning and investment practice.
- 2003 – 2013 Wealth Manager, LPL Financial LLC, Charlotte, NC, comprehensive estate and investment planning for professionals, families and closely held corporations.
- 2013 – Present, Principal of Dalton Financial LLC, a Registered Investment Advisor based in Charlotte, NC, providing investment management and financial planning services to individuals, families, and closely-held businesses.

Disciplinary Information: None

Other Professional Activities: Member of Finance and Investment Committees of Aldersgate Retirement Community in Charlotte, NC

Additional Compensation: None

Supervision: Robert Higgins is supervised by Robert Higgins, Managing Member.

Robert Dalton Higgins contact information:

(704) 907-0315

Bob@DaltonFin.com

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None