

**Part 2A of Form ADV: Firm Brochure**

Item 1 Cover Page

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This brochure provides information about the qualifications and business practices of Altus Wealth Management, LLC ("Altus Wealth Management"). If you have any questions about the contents of this brochure, please contact us at 859-815-8566 or [info@altuswm.com](mailto:info@altuswm.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (the "SEC") or by any state securities authority.

Additional information about Altus Wealth Management is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 Material Changes

Altus Wealth Management does not have any material changes since our last brochure filing on August 28, 2014. Other amendments were made to this brochure, and consequently we encourage you to read the brochure in its entirety.

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#### Item 4 Advisory Business

Altus Wealth Management is a limited liability company providing investment advisory services to individuals and businesses. Altus Wealth Management was formed on March 29, 2010. The firm is owned in equal share amounts by three managing partners, namely Steven D. O'Connor, William H. Doecker, and Andrew M. Hermes.

Altus Wealth Management provides its clients with discretionary investment management services. These services may include assistance in determining risk and return objectives for clients in relation to their other holdings, defining the asset configuration designed to meet client objectives, selecting securities designed to meet client objectives, and assuming discretionary responsibility for all aspects of day-to-day management and investment of the client's account.

Altus Wealth Management offers its services through separate account management. Altus Wealth Management offers three different investment models, namely Altus Select, Altus Premier and Altus Preservation. Altus Select is for account balances lower than \$300,000 and Altus Premier is for account balances greater than \$300,000. Both models primarily utilize Exchange Traded Funds ("ETF"s) and mutual funds for the equity component and any alternative investment exposure in the portfolio. Altus Select primarily utilize ETF's and mutual funds for the fixed income portion of the portfolio and Altus Premier primarily utilize individual bonds for the fixed income portion of the portfolio. Altus Preservation is a fixed-income portfolio utilizing individual fixed income securities. Altus Wealth Management strategies typically hold investments longer than 12 months, however, we may hold investments for less than twelve months and in some cases, for less than 30 days.

Altus Wealth Management also provides financial planning for its clients. Services begin with a consultation during which pertinent information about a client's financial circumstances and objectives are discussed, and after which Altus Wealth Management will produce a financial plan. The fee charged for this service is generally an hourly rate of \$250.00, and a \$250.00 retainer may be payable upon signing the agreement. This fee constitutes a credit balance against which hourly fees will be charged. Consulting services may be delivered over the phone, in person or by electronic means. Any balance due will generally be payable within 15 calendar days of delivery of the agreed upon financial plan. Any unearned fees will be refunded at the completion of the services.

Discretionary assets under management as of March 23, 2015 are \$111,301,818.00. Altus Wealth Management does not currently manage any assets on a non-discretionary basis.

It is anticipated that insurance planning opportunities will develop through the natural course of the financial planning process and insurance products may be recommended from time to time. The products recommended may be sold in exchange for a commission.

## Item 5 Fees and Compensation

The client will compensate Altus Wealth Management for its services based on a percentage of the average daily balance of the total net assets in the account for each calendar quarter according to the below fee schedule. All fees are negotiable. Fees will be withdrawn from the client's account and all fees will be payable quarterly in arrears. The client may be given the option to have their advisory fees invoiced.

Fees will be separately noted on a client's custodial statement in the month in which they are charged. There will be a mailing of the fee invoice to the custodian. Upon Client request, Altus Wealth Management will provide an invoice which reflects the formula used to calculate the fees, the time period covered by the fee, and the amount of assets under management on which the fee was based. The custodian will likely impose fees or expenses on the purchase and/or sell of securities. Please see the custodian agreement for applicable fees and expenses.

Altus Wealth Management will generally allocate brokerage to those firms providing the best service at the lowest price, but may, from time to time, pay a brokerage commission in excess of that which another broker might have charged for the same transaction in recognition of the value of brokerage and/or research services generally provided to Altus Wealth Management. Altus Wealth Management does not receive compensation in connection with the purchase or sale of securities, including asset based sales charges, commissions, markups or service fees from the sale of mutual funds.

Altus Wealth Management's Fee Schedule at the effective date is as follows (*subject to revision as provided in the Agreement*):

**Altus Select Advisory Fee**

on account assets up to \$300,000.00 [0.95% annual (0.2375% per quarter)]

**Altus Premier Advisory Fee\***

on account assets from \$300,001.00 to \$500,000.00 [0.95% annual (0.2375% per quarter)]

on account assets from \$500,001.00 to \$1,000,000.00 [0.90% annual (0.225% per quarter)]

on account assets from \$1,000,001.00 to \$2,000,000.00 [0.80% annual (0.200% per quarter)]

on account assets from \$2,000,001.00 to \$3,000,000.00 [0.70% annual (0.1750% per quarter)]

on account assets from \$3,000,001.00 to \$5,000,000.00 [0.60% annual (0.150% per quarter)]

on account assets over \$5,000,001.00 Negotiable

*\*For purposes of clarity, it is not a tiered fee schedule and thus by way of example, if a client has \$1.5 million under management, the fee will be 0.80%*

**Altus Preservation (fixed income portfolio) Advisory Fee\***

on account assets from \$300,000.00 to \$1,000,000 0.375% annual (0.0938% per quarter)

on account assets from \$1,000,001.00 to \$3,000,000.00 0.250% annual (0.0625% per quarter)

on account assets over \$3,000,001.00 Negotiable

*\*For purposes of clarity, it is not a tiered fee schedule and thus by way of example, if a client has \$1.5 million under management, the fee will be 0.250%*

While Altus Wealth Management's fees are typically based upon the fee schedule, Altus Wealth Management's fees may vary among clients depending on a client's particular circumstances, including length of a client's relationship, different fee schedules over time, and the amount of portfolio assets. Also, Altus Wealth Management may from time to time waive, reduce, or adjust a client's fees depending on a client's particular circumstances. Upon the commencement or termination of a client's relationship, Altus Wealth Management's fees may be prorated.

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

Altus Wealth Management does not engage in performance-based fees. Altus Wealth Management's practice also does not include side-by-side management.

Item 7      Types of *Clients*

Altus Wealth Management generally provides investment advice to individuals, profit sharing plans, trust, estates, charitable organizations, and corporations or business entities other than those listed above. Altus Wealth Management does not have a minimum account size or any requirements to maintain an account.



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

Altus Wealth Management's investment strategy leverages Modern Portfolio Theory to assist in the construction and management of strategic asset allocation and diversification of investment portfolios. The purpose of Modern Portfolio Theory is to select a collection of investment assets that has collectively lower risk than any individual asset. Asset allocation consists of a mix of stocks, bonds, cash and alternative asset classes used to construct the portfolio.

To supplement Modern Portfolio Theory, Altus Wealth Management also may utilize tactical asset allocation. Tactical asset allocation is an active investment strategy that is designed to adjust overall portfolio asset mix based on new information and discernible trends in global markets.

Altus Wealth Management aims to select investments with low management fees and transaction costs. Index-based investments in particular, along with tax advantages and built-in diversification within market segments, offer especially low expenses. Accordingly, our actively managed portfolios will incorporate low cost ETFs, mutual funds and individual fixed income as core positions in each portfolio in an effort to reduce cost, enhance consistency and promote tax efficiency.

Investing in individual fixed income has the potential for the following risks: inflation risk, interest rate risk, default risk, liquidity risk, reinvestment risk and call risk.

Altus Wealth Management will use several methods of analysis in formulating investment advice and in developing investment strategies. These methods include fundamental analysis and technical analysis (e.g. charting).

We believe in the use of relative strength analysis (the strength of a security in relation to its sector or the overall market) to aid us in owning what we believe are the strongest asset classes and sectors. We are not constrained by benchmark sector weightings. Our strategy is not considered market timing, rather, we believe in taking a more defensive position when our indicators tell us to do so.

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Disciplinary Information

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of Altus Wealth Management's advisory and financial planning business or the integrity of our management.

Item 10 Other Financial Industry Activities and Affiliations

Altus Wealth Management has a material relationship with our current custodian, Charles Schwab & Co., Inc. However, Altus Wealth Management and client will mutually agree to determine the broker or brokers through whom, and the commission rates at which transactions will be executed, for client accounts. Notwithstanding the foregoing, it is anticipated that Altus Wealth Management and client will form a working relationship with Charles Schwab & Co., Inc. Brokers will be selected on the basis of the ability to provide best execution and only secondarily on the basis of research services. If the quality of brokerage services between and among brokers is essentially the same, Altus Wealth Management may consider the quality of the research services provided by such firms in terms accuracy, thoroughness, timeliness, uniqueness and overall benefit to accounts under management in allocating brokerage among such firms. Altus Wealth Management may allocate brokerage to those firms providing best execution, but may, from time to time, pay a brokerage commission in excess of that which another broker might have charged for the same transaction in recognition of the value of brokerage and/or research services generally provided to Altus Wealth Management. When Altus Wealth Management receives research services (as defined in Item 12: Brokerage Practices) Altus Wealth Management will seek to comply with the conditions set forth in Section 28(e) of the Securities Exchange Act of 1934.

Mr. Doecker maintains an Ohio insurance license and may engage in insurance planning and sales activities. Mr. Doecker anticipates that he will spend approximately 1% of his time on the insurance business. It is anticipated that the insurance planning opportunities will develop through the natural course of the financial planning practice as insurance analysis is a component of the typical financial plan.

Mr. O'Connor maintains a Kentucky insurance license and may engage in insurance planning and sales activities. Mr. O'Connor anticipates that he will spend approximately 1% of his time on the insurance business. It is anticipated that the insurance planning opportunities will develop through the natural course of the financial planning practice as insurance analysis is a component of the typical financial plan.

Mr. Hermes maintains a Kentucky insurance license and may engage in insurance planning and sales activities. Mr. Hermes anticipates that he will spend approximately 1% of his time on the insurance business. It is anticipated that the insurance planning opportunities will develop through the natural course of the financial planning practice as insurance analysis is a component of the typical financial plan.

As licensed insurance agents, it is anticipated that insurance planning opportunities will develop through the natural course of the financial planning process and insurance products may be recommended from time to time. The products recommended may be sold in exchange for a commission. If an insurance product is selected for a client, Altus Wealth Management will disclose that a commission will be charged rather than an advisory or financial planning service fee. This may present a conflict of interest, in which, the commission derived from the insurance product could be greater than the fee received from Altus Wealth Management's advisory and financial planning services. To ensure that the client's needs are met with an appropriate financial solution, we will offer insurance products when they are a more suitable option as an alternative or in conjunction with our advisory and financial planning services.

Clients have the option to purchase the recommended insurance product from other brokers or agents that are not affiliated with Altus Wealth Management.

Mr. O'Connor serves on the board of Ria Vista Home Owners Association, Inc. in a non-financial capacity. Altus Wealth Management is prohibited from forming any contractual relationship with the above referenced entity.

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

Altus Wealth Management or a related person may buy or sell for itself securities that it also recommends to its clients. Employees of Altus Wealth Management are required to comply with the Code of Ethics policy and the Policy Relating to Trading of Securities by Personnel of Investment Advisor. Every client or prospective client will also upon written request receive a copy of the Company's Code of Ethics.

**Background**

Altus Wealth Management has adopted a code of ethics to:

- (i) set forth standards of conduct expected of advisory personnel (including compliance with federal securities laws);
- (ii) safeguard material non-public information about client transactions; and
- (iii) require “employees” to report their personal securities transactions.

Item 12 Brokerage Practices

Altus has a material relationship with our current custodian, Charles Schwab & Co. Inc. However, Altus Wealth Management and client will mutually agree to determine the broker or brokers through whom, and the commission rates at which transactions will be executed, for client accounts. Notwithstanding the foregoing, it is anticipated that Altus and the client will form a working relationship with Charles Schwab & Co., Inc. Altus weighs a number of factors in its decision to select Schwab as a broker-dealer. These include technology and software, mutual fund availability and institutional bond pricing among others. Brokers will be selected on the basis of the ability to provide the best price and best execution and only secondarily on the basis of research services. In evaluating our custodian, we also consider the broker-dealers' reputation, financial strength and customer service responsiveness. Altus does not receive any soft-dollar benefits, nor do we receive any proprietary research or other products or services that are not generally available to all of the custodian's clients. If the quality of brokerage services between and among brokers is essentially the same, Altus will consider the quality of the research services provided by such firms in terms of accuracy, thoroughness, timeliness, uniqueness and overall benefit to accounts under management in allocating brokerage among such firms. Altus will generally allocate brokerage to those firms providing the best service at the lowest price, or those firms that specialize in specific types of securities, but may, from time to time, pay a brokerage commission in excess of that which another broker might have charged for the same transaction in recognition of the value of brokerage and/or research services generally provided to Altus.

When Altus Wealth Management receives research services (as defined in the following paragraph) Altus Wealth Management will seek to comply with the conditions set forth in Section 28(e) of the Securities Exchange Act of 1934.

Research services received include, but are not limited to, the following types of research: earnings estimates, technical equity research, industry analysis, investment strategy, risk model/optimization, statistical and financial theory, commentaries on recent academic statistical and financial research, and general market news. These reports may be issued in written, computerized or oral form, and may be proprietary or provided by an independent third party. Research also includes computer equipment and software used in the conduct of research activities that support portfolio management.

Research services furnished by brokers through whom Altus Wealth Management effects securities transactions may be used by Altus Wealth Management in servicing all of its accounts, not just those accounts which paid commissions to the brokers providing the research services.

In an effort to trade more efficiently, Altus Wealth Management may bunch trades so that each client receives an average execution price. By bunching trades, Altus Wealth Management is in a better position to negotiate lower commissions. If a trade is not fully executed, Altus Wealth Management will generally prorate the amount executed to each client based on their respective share of the total trade, unless circumstances warrant otherwise.

If a client requests directed brokerage arrangements, Altus Wealth Management will not seek to negotiate best execution and, as a result, client may not receive best execution.

Item 13      Review of Accounts

Each client's account will generally be assigned to a managing partner who will serve as portfolio manager. It will be the responsibility of the portfolio manager to reach a clear understanding with the client as to the appropriate guidelines and objectives for his/her account. At the time when the initial contribution is received from the client, a formal review of the account will be undertaken by the portfolio manager, a general statement of investment policy will be prepared for the account and a long term investment strategy will be prepared for the account in light of the guidelines and objectives and in view of the longer term investment outlook of Altus Wealth Management. Following this initial review, at least one of the portfolio managers; William H. Doecker, Steven O'Connor and/or Andrew M. Hermes of Altus Wealth Management, will assume day-to-day responsibility for the management of the account(s). This process will be conducted again on an annual basis to determine if guidelines or objectives have changed.

Subsequently, reviews will be conducted quarterly, or at the client's discretion, at which time policy and strategy positions for the account will be reassessed in light of the current investment outlook; performance of any changes in the portfolio since the previous review will be evaluated; and a proposed tactical investment program will be approved. At least once each year the formal review includes a re-examination of the guidelines and objectives as to appropriateness. From time to time, as deemed appropriate by the portfolio managers, special reviews will be conducted to consider the effect of unusual economic, political or other macro-economic developments which seem likely to call for particular attention. Additionally on an annual basis, the Firm will consult with the client with respect to lifestyle changes, risk tolerance changes, other life events which could have an impact on planning and other changes in client profile to determine if modifications or adjustments are required

The Custodian will be responsible for producing and delivering the monthly or quarterly statements. These statements will describe all assets held, and market price for each position and the market value of the account and transactions that were undertaken during the relevant period.

Item 14      *Client Referrals and Other Compensation*

Altus Wealth Management does not receive any economic benefit from someone who is not a client for providing investment advice or other advisory services to our clients.

Altus Wealth Management does not compensate any person directly or indirectly for client referrals.

Item 15      *Custody*

Altus Wealth Management does not custody any client funds or securities. In addition, Altus Wealth Management does not produce or provide account statements for its clients.

Monthly or Quarterly statements are provided by the qualified custodian (*see item 13. Review of Accounts*) Clients should carefully review account statements sent to them by the qualified custodian.



Item 16      Investment Discretion

Altus Wealth Management has discretionary authority, pursuant to its written or oral investment management agreements with Clients, to determine, without obtaining specific client consent, the securities to be bought or sold, the amount of the securities to be bought or sold, the brokers or dealers through which transactions will be executed, and the amount of commissions or mark ups or mark downs paid. Any restrictions or limitations on Altus Wealth Management's discretionary authority must be made in writing and contained in the investment management agreement between Altus Wealth Management and the Client.

Altus Wealth Management does accept disbursement authorization on behalf of Client's accounts. Client's acceptance of this disbursement authorization is agreed upon by selecting disbursement authorization within the authorizations section of the custodian application and by signing the custodian application. In addition, Client's acceptance of this disbursement authorization is agreed upon by initialing "Schedule A" of Altus Wealth Management's Client Agreement and by signing the Client Agreement.

This disbursement authorization allows Altus Wealth Management to disburse assets from a client's account for investment purposes and to direct funds to a client personally. At Altus Wealth Management's instructions, the custodian is authorized to remit checks, wire funds and make certain disbursements of funds held in the account as regulations permit to banks, broker-dealers, investment companies or other financial institutions for credit to an account of identical registration, or to the client's address of record. This disbursement authorization does not apply to electronic distributions or direct, ongoing electronic payments of dividends, interest and money market income. The client acknowledges that any disbursement made to them personally may constitute a taxable distribution. Certain transfers between IRAs may be permitted.

Item 17      Voting *Client* Securities

Altus Wealth Management does not have and will not accept authority to vote client securities. All issuer and issuer related communications are generally delivered directly to the client. By signing the custodian application, the client acknowledges that Altus Wealth Management will not accept voting rights on securities.

Item 18 Financial Information

Altus Wealth Management does not require or solicit prepayment of more than \$500.00 in fees per client, six months or more in advance.

Altus Wealth Management does not have any financial commitments that might impair our current or future ability to meet our contractual commitments to clients and we have not been the subject of a bankruptcy petition at any time during the past ten years.

Item 19      Requirements for State-Registered Advisers

