

SEC Form ADV Part 2A
"Brochure"

Item 1 Cover Page

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March 20, 2024

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. 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.

Altus Wealth Management is a registered investment adviser. Registration of an investment adviser does not imply any level of skill or training.

Additional information about Altus Wealth Management is also available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Material Changes

Altus Wealth Management does not have any material changes since our last brochure filing on March 30, 2023. 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, The Altus OC Group Inc, William H. Doepker, 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 asset class investment exposure in the portfolio. Altus Select primarily utilizes ETF's and mutual funds for the fixed income portion of the portfolio and Altus Premier primarily utilizes individual bonds for the fixed income portion of the portfolio. Altus Preservation is a fixed-income portfolio utilizing individual fixed income securities for account balances greater than \$300,000. 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 Select and Altus Premier clients may be offered the opportunity to participate in limited offerings. Please note, in some instances, only accredited investors can invest in limited offerings.

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 20, 2024 are \$319,630,216. Altus Wealth Management does not currently manage any assets on a non-discretionary basis.

Item 5 Fees and Compensation

Clients 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. 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. Investments in mutual funds and exchange traded funds generally include an embedded investment management fee paid to the mutual fund or exchange traded fund. As such, client portfolios with investments in those types of securities may be subject to two layers of management fees. Clients who participate in limited offerings will be charged a fee and expenses by the limited offering. This is in addition to the advisory fee charged by Altus Wealth Management. For additional details on the limited offering fees and expenses, clients should review the applicable prospectus and limited offering agreement. 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 may recommend that a client rollover retirement accounts in order for Altus to provide investment advisory services to those accounts. As a result, Altus will earn a management fee and that fee may be higher than the fees and expenses incurred by the client should the rollover not occur. More assets in an account means more fees, thus we have an incentive to encourage a client to increase assets in their account.

On occasion, Altus or its supervised persons may invest in the same securities as those recommended to clients. This may create potential conflicts of interest because (1) Altus or its supervised persons may have an incentive not to recommend the sale of those securities to clients in order to protect the value of their personal investment, and (2) Altus or its supervised persons may have an incentive to place their orders before those of clients in order to obtain a better price.

Altus' Code of Ethics addresses these potential conflicts of interest by instituting a standard of business conduct for all supervised persons, by prohibiting supervised persons from effecting certain securities transactions without obtaining pre-clearance from Altus' Chief Compliance Officer and by reviewing personal securities transactions reports filed by supervised persons for potential conflicts of interest. Altus' Chief Compliance Officer reserves the right to disapprove any proposed transaction that may have the appearance of improper conduct.

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 \$300,000.01 to \$500,000.00 [0.95% annual (0.2375% per quarter)]

on account assets from \$500,000.01 to \$1,000,000.00 [0.90% annual (0.225% per quarter)]

on account assets from \$1,000,000.01 to \$2,000,000.00 [0.80% annual (0.200% per quarter)]

on account assets from \$2,000,000.01 to \$3,000,000.00 [0.70% annual (0.1750% per quarter)]

on account assets from \$3,000,000.01 to \$5,000,000.00 [0.60% annual (0.150% per quarter)]

on account assets over \$5,000,000.01 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 \$1,000,000.01 to \$3,000,000.00 0.250% annual (0.0625% per quarter)

on account assets over \$3,000,000.01 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. Altus may waive account model minimums to allow clients flexibility to qualify for Altus Premier and Altus Preservation.

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, trusts and charitable organizations. 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. While holding investments, if Altus has not actively traded for a period of time it does not mean that the firm is not regularly monitoring the investments. Altus continuously monitors and researches all portfolio investments for changes in market conditions, regulatory changes and changes in the management of the mutual fund or ETF.

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. In addition, for some clients, Altus Wealth Management will recommend investing in limited offerings. Any fees and expenses charged by the limited offering are in addition to our fee.

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.

All investing and trading activities risk the loss of capital. Although we will attempt to moderate these risks, no assurance can be given that the investment activities of an account we advise will achieve the investment objectives of such account or avoid losses. Direct and indirect investing in securities involves risk of loss that you should be prepared to bear. Funds held in a cash or money market fund generate little income and thus, after the management fee, clients may take a loss on those funds. Altus generally uses cash and money market accounts strategically to protect assets when markets are volatile, to hold assets waiting to be allocated to other investments, or to maintain a small amount of cash to pay custodian, transaction, and advisory fees without having to sell investments.

We do not represent or guarantee that our services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections or declines. We cannot offer any guarantees or promises that your financial goals and objectives will be met. Past performance is in no way an indication of future performance. It is important that you understand the risks associated with investing in the types of investments listed above.

Except as may otherwise be provided by law, we are not liable to clients for:

- Any loss that you may suffer by reason of any investment decision made or other action taken or omitted by us in good faith;
- Any loss arising from our adherence to your instructions or the disregard of our recommendations made to you; or
- Any act or failure to act by a custodian or other third party to your account.

The information included in this Brochure does not include every potential risk associated with an investment strategy, technique or type of security applicable to a particular client account. You are encouraged to ask questions regarding risks applicable to a particular strategy or investment product and read all product-specific risk disclosures. It is your responsibility to give us complete information and to notify us of any changes in financial circumstances or goals.

There are certain additional risks associated when investing in securities; including, but not limited to:

- **Market Risk:** Either the stock market as a whole, or the value of an individual company, goes down resulting in a decrease in the value of client investments. This is also referred to as systemic risk.
- **Inflation Risk:** The Firm's portfolios face inflation risk, which results from the variation in the value of cash flows from a financial instrument due to inflation, as measured in terms of purchasing power. When inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Interest Rate Risk:** The price of most fixed income securities move in the opposite direction of the change in interest rates. For example, as interest rates rise, the prices of fixed income securities fall. If the Firm holds a fixed income security to maturity, the change in its price before maturity may have little impact on the Firm portfolios' performance. However, if the Firm determines to sell the fixed income security before the maturity date, an increase in interest rates could result in a loss.
- **Equity (stock) market risk:** Common stocks are susceptible to general stock market fluctuations and to volatile increases and decreases in value as market confidence in and perceptions of their issuers change. If you held common stock, or common stock equivalents, of any given issuer, you would generally be exposed to greater risk than if you held preferred stocks and debt obligations of the issuer.
- **Company Risk:** When investing in stock positions, there is always a certain level of company or industry specific risk that is inherent in each investment. This is also referred to as unsystematic risk and can be reduced through appropriate diversification. There is the risk that the company will perform poorly or have its value reduced based on factors specific to the company or its industry. For example, if a company's employees go on strike or the company receives unfavorable media attention for its actions, the value of the company may be reduced.
- **Liquidity Risk:** Certain assets may not be readily converted into cash or may have a very limited market in which they trade. You may experience the risk that your investment or assets within your investment may not be able to be liquidated quickly, thus, extending the period of time by which you may receive the proceeds from your investment. Liquidity risk can also result in unfavorable pricing when exiting (i.e. not being able to quickly get out of an investment before the price drops significantly) a particular investment and therefore, can have a negative impact on investment returns.
- **ETF and Mutual Fund Risk:** When investing in an ETF or mutual fund, a client will bear additional expenses based on the client's pro rata share of the ETF's or mutual fund's operating expenses, including the potential duplication of management fees. The risk of owning an ETF or mutual fund generally reflects the risks of owning the underlying securities the ETF or mutual fund holds. Clients will also incur brokerage costs when purchasing ETFs.

- **Risks Associated with Fixed Income:** When investing in fixed income instruments such as bonds or notes, the issuer may default on the bond and be unable to make payments. Further, interest rates may increase and the principal value of your investment may decrease. Individuals who depend on set amounts of periodically paid income face the risk that inflation will erode their spending power.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to bonds.
- **Call Risk:** Bonds that are callable carry an additional risk because they may be called prior to maturity depending on current interest rates thereby increasing the likelihood that reinvestment risk may be realized.
- **Credit Risk:** The price of a bond depends on the issuer's credit rating, or perceived ability to pay its debt obligations. Consequently, increases in an issuer's credit risk, may negatively impact the value of a bond investment.
- **Options Risk:** Options on securities may be subject to greater fluctuations in value than an investment in the underlying securities. Purchasing and writing put and call options are highly specialized activities and entail greater than ordinary investment risks.
- **Speculation Risk:** The commodities markets are populated by traders whose primary interest is in making short-term profits by speculating whether the price of a security will go up or go down. The speculative actions of these traders may increase market volatility that could drive down the prices of commodities.
- **Geopolitical Risk:** The risk an investment's returns could suffer as a result of political changes or instability in a country. Instability affecting investment returns could stem from a change in government, legislative bodies, other foreign policy makers or military control.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Foreign Market Risk:** The securities markets of many foreign countries, including emerging countries, have substantially less trading volume than the securities markets of the United States, and securities of some foreign companies are less liquid and more volatile than securities of comparable United States companies. As a result, foreign securities markets may be subject to greater influence by adverse events generally affecting the market, by large investors' trading significant blocks of securities, or by large dispositions of securities, than as it is in the United States. The limited liquidity of some foreign markets may affect our ability to acquire or dispose of securities at a price and time it believes is advisable. Further, many foreign governments are less stable than that of the United States. There can be no assurance that any significant, sustained instability would not increase the risks of investing in the securities markets of certain countries.
- **Counterparty and Broker Credit Risk:** Certain assets will be exposed to the credit risk of the counterparties when engaging in exchange-traded or off-exchange transactions. There may be a risk of loss of assets on deposit with or in the custody of a broker in the event of the broker's bankruptcy, the bankruptcy of any clearing broker through which the broker executes and clears transactions, or the bankruptcy of an exchange clearinghouse.

- **Leverage Risk:** Although Altus Wealth Management does not employ leverage in the implementation of its investment strategies, some ETPs and CEFs employ leverage. Leverage increases returns to investors if the investment strategy earns a greater return on leveraged investments than the strategy's cost of such leverage. However, the use of leverage exposes investors to additional levels of risk and loss that could be substantial.
- **Market Volatility:** The profitability of the portfolios substantially depends upon the Firm correctly assessing the future price movements of stocks, bonds, options on stocks, and other securities and the movements of interest rates. The Firm cannot guarantee that it will be successful in accurately predicting price and interest rate movements.
- **Management Risk:** Your investments will vary with the success and failure of our investment strategies, research, analysis and determination of portfolio securities. If you implement our financial planning recommendations and our investment strategies do not produce the expected results, you may not achieve your objectives.
- **Accuracy of Public Information:** The Firm selects investments, in part, on the basis of information and data filed by issuers with various government regulators or made directly available to the Firm by the issuers or through sources other than the issuers. Although the Firm evaluates all such information and data and sometimes seeks independent corroboration when it's considered appropriate and reasonably available, the Firm is not in a position to confirm the completeness, genuineness, or accuracy of such information and data. In some cases, complete and accurate information is not available.
- **Trading Limitations:** For all securities, instruments and/or assets listed on an exchange, including options listed on a public exchange, the exchange generally has the right to suspend or limit trading under certain circumstances. Such suspensions or limits could render certain strategies difficult to complete or continue and subject the account to loss. Also, such a suspension could render it impossible for the Firm to liquidate positions and thereby expose the Client account to potential losses.
- **Recommendation of Particular Types of Securities:** In some cases, the Firm recommends mutual funds. There are several risks involved with these funds. These funds have portfolio managers that trade the fund's investments in agreement with the fund's objective and in line with the fund prospectus. While these investments generally provide diversification there are some risks involved especially if the fund is concentrated in a particular sector of the market, uses leverage, or concentrates in a certain type of security (i.e. foreign equities). The returns on mutual funds can be reduced by the costs to manage the funds. And the shares rise and fall in value according to the supply and demand. Open end funds may have a diluted effect on other investors' interest due to the structure of the fund while closed end funds have limited shares which rise and fall in value according to supply and demand in the market. In addition, closed end funds are priced daily and as a result they may trade differently than the daily net asset value (NAV).
- **Firm's Investment Activities:** The Firm's investment activities involve a significant degree of risk. The performance of any investment is subject to numerous factors which are neither within the control of nor predictable by the Firm. Such factors include a wide range of economic, political, competitive and other conditions (including acts of terrorism and war) that may affect investments in general or specific industries or companies. The markets may be volatile, which may adversely affect the ability of the Firm to realize profits on behalf of its Clients. As a result of the nature of the Firm's investing activities, it is possible that the Firm's results may fluctuate substantially from period to period.

- **Material Non-Public Information:** By reason of their responsibilities in connection with other activities of the Firm and/or its principals or employees, certain principals or employees of the Firm and/or its affiliates may acquire confidential or material non-public information or be restricted from initiating transactions in certain securities. The Firm will not be free to act upon any such information. Due to these restrictions, the Firm may not be able to initiate a transaction that it otherwise might have initiated and may not be able to sell an investment that it otherwise might have sold.
- **Legal and Regulatory Risks:** The regulation of the U.S. and non-U.S. securities and futures markets investment funds has undergone substantial change in recent years and such change may continue. In particular, in light of the recent market turmoil there have been numerous proposals, including bills that have been introduced in the U.S. Congress, for substantial revisions to the regulation of financial institutions generally. Some of the additional regulation includes requirements that private fund managers register as investment advisers under the Advisers Act and disclose various information to regulators about the positions, counterparties and other exposures of the private funds managed by such managers. Further, the practice of short selling has been the subject of numerous temporary restrictions, and similar restrictions may be promulgated at any time. Such restrictions may adversely affect the returns of Underlying Investment Funds that utilize short selling. The effect of such regulatory change on the accounts and/or the underlying investment funds, while impossible to predict, could be substantial and adverse

There are additional risks associated with investing in limited offerings, these may include:

- Price declines in the U.S. corporate debt market may adversely affect the fair value of the limited offering's portfolio, reducing our NAV through increased net unrealized depreciation.
- Our Board of Trustees may change the limited offering's operating policies and strategies without prior notice or shareholder approval, the effects of which may be adverse to the results of operations and financial condition.
- The limited offering may be a relatively new company and have a limited operating history.
- Loss of key personnel may adversely affect the limited offering.
- The limited offering may face increasing competition for investment opportunities, which could delay deployment of our capital, reduce returns and result in losses

Item 9 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

Mr. O'Connor volunteers at 7 Hills Church as a financial counselor to assist members with budgeting, debt reduction, and building an emergency fund. Altus does not foresee this creating any conflict of interest due to the limited scope of the financial planning performed.

Mr. O'Connor also serves on the board of STG Foundation. Three other board members for the STG Foundation are also AWM clients.

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.

We recognize that the personal investment transactions of members and employees of our firm demand the application of a Code of Ethics and require that all such transactions be carried out in a way that does not endanger the interest of any client. At the same time, we believe that if investment goals are similar for clients and for members and employees of our firm, it is logical and even desirable that there be common ownership of some securities. Therefore, to prevent conflicts of interest, we have in place a set of procedures (including a pre-clearing procedure) with respect to transactions effected by our members, officers and employees for their personal accounts. To monitor compliance with our personal trading policy, we have a quarterly securities transaction reporting system for all our associates. Upon employment or affiliation and at least annually thereafter, all supervised persons will sign an acknowledgement that they have read, understand, and agree to comply with our Code of Ethics. Altus Wealth Management also reserves the right to disapprove any proposed transaction that may have the appearance of improper conduct.

Item 12 Brokerage Practices

Altus has a material relationship with Charles Schwab & Co. Inc. Brokers will be selected on the ability to provide best execution and only secondarily on the basis of research services. Also, Altus weighs a number of other factors in its decision to select Charles Schwab & Co. Inc. as a broker-dealer. These include technology and software, mutual fund availability and institutional bond pricing among others. In evaluation, 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 then 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, from time to time, may 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. Altus will also periodically and systematically evaluate the execution performance of the broker-dealers executing transactions on behalf of Altus for its clients.

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 in light of the guidelines and objectives and in view of the longer-term investment outlook of Altus Wealth Management.

Following this formal review, at least one of the portfolio managers; William H. Doepker, 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). Subsequently, reviews will be attempted periodically, or at the client's discretion, at which time policy and strategy positions for the account will be reassessed. On an annual basis, the Firm will consult with the client with respect to lifestyle changes, risk tolerance changes, or other life events 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 compensate any person directly or indirectly for client referrals.

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.

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.

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.

