

SEC Form ADV Part 2A Firm Brochure

Altiora Financial Group, LLC

March 9, 2020

Item 1 – Cover Page

This Brochure provides information about the qualifications and business practices of Altiora Financial Group, LLC (“Altiora” or “we”). The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Altiora is available on the SEC website at www.adviserinfo.sec.gov. The CRD number for Altiora is 292008.

Altiora Financial Group, LLC is a registered investment adviser. Registration does not imply a certain level of skill or training.

Primary Office/Legal Address:

1607 Marietta Dr.
Lebanon, OH 45036
(513) 652-5776

<https://www.altiora.com>

Additional Office/Mailing Address:

3825 Edwards Road, Suite 103
Cincinnati, OH 45209

Item 2 – Material Changes

This Brochure replaces our previous brochure dated March 15, 2019. The following are material changes in our business since our last annual update filing:

- There have been no material changes to our brochure since our last annual updating amendment filing on March 15, 2019.

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Item 4 – Advisory Business

OVERVIEW

Altiora Financial Group, LLC (“Altiora” or “we”) is a Limited Liability Company organized in the state of Ohio. Altiora provides investment and financial advisory services, as described below.

Derek R. Tinnin is the principal owner of Altiora. Please see Brochure Supplement, Exhibit A, for more information.

As of December 31, 2019, we managed assets totaling \$474,173,601, comprised of \$362,700,647 on a discretionary basis and \$111,472,954 on a non-discretionary basis.

SERVICES PROVIDED

Investment and Financial Advisory Retainer

We offer a combined Investment and Financial Advisory service.

For the investment aspect of the service, we offer investment planning and investment supervisory services based on your financial circumstances, investment objectives, risk capacity, and risk tolerance. We create a financial outline based on your Financial Profile and an Investment Policy Statement (IPS) to describe investment objectives and guidelines. The Financial Profile reflects your current financial picture and investment goals. The IPS outlines the investment strategy, asset allocation, and types of investments based on that Profile.

Ongoing investment supervisory services may include:

- Investment plan implementation
- Portfolio monitoring and management
- Portfolio accounting and reconciliation
- Portfolio performance reporting
- Portfolio tax gain/loss harvesting
- Assistance with cashiering and transfers
- Account maintenance and administrative services

The Financial Profile and IPS are discussed regularly with you, which does not necessarily result in a written document. The IPS will be updated from time to time upon your request, or when we determine it to be necessary or advisable based on updates to your financial or other circumstances.

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Our investment services are largely based on academic research and evidence-based strategies. For additional information about our approach to investing, please see Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss.

To implement your IPS, we will manage your investment portfolio on either a discretionary or a non-discretionary basis. As a discretionary investment adviser, we will have the authority to supervise and direct your portfolio without prior consultation with you. Under a non-discretionary arrangement, you must be contacted prior to the execution of any trade in the account(s) under management. In a non-discretionary arrangement, you retain the final decision on all portfolio actions.

Notwithstanding the foregoing, you may impose certain restrictions on us, such as prohibiting certain types of investments or the sale of certain investments held at the commencement of the relationship. These restrictions may adversely affect the composition and performance of the portfolio. Your portfolio is treated individually with respect to each purchase or sale for your account(s). For these and other reasons, performance of client investment portfolios within the same investment objectives, goals and/or risk tolerance may differ, and you should not expect that the composition or performance of your investment portfolio would necessarily be consistent with our similar clients.

For the Financial Advisory aspect of the service, we create a Financial Plan to address areas of focus of your financial situation, following these steps:

- Define the planning relationship
- Organize data and define financial goals
- Analyze and evaluate current financial status
- Review recommendations and alternatives
- Coordinate the implementation of recommendations
- Benchmark plan progress against defined financial goals

The areas of focus in the Financial Plan may include:

- Retirement planning
- Education planning
- Investment risk analysis
- Cash flow strategies
- Charitable planning strategies
- Employee benefits, stock options, restricted stock planning
- Insurance policy and annuity reviews
- General income tax planning strategies
- General estate planning strategies

You are under no obligation to act upon any of the recommendations we make under a Financial Plan or to engage us or any recommended professional for additional services.

Item 5 – Fees and Compensation

OVERVIEW

Fees you pay to us are exclusive of all custodial and transaction costs paid to your custodian, brokers or third parties. Please see Item 12 – Brokerage Practices for additional information. Fees paid to us are separate and distinct from the fees and expenses charged by mutual funds, exchange-traded funds (ETFs) or other pooled funds (generally including management fees and fund expenses as described in each fund's prospectus or offering materials). You should review all fees charged by funds, brokers, us and others to fully understand the total amount of fees paid.

Either party may terminate the Service Agreement at any time, subject to written notice requirements in the Agreement. In the event of termination, any paid but unearned fees will be promptly refunded to you based on the number of days that the services were provided, and any fees due to us will be invoiced or deducted from your account prior to termination.

ADVISORY FEES

Our compensation philosophy is a function of our advice-centric business model. This is an important distinction when comparing to firms that follow an asset-centric or asset gathering model.

We charge a flat fixed retainer fee for a combined Investment and Financial Advisory service. A percentage of portfolio size does not apply. The fee is negotiated individually and generally ranges between \$4,000 and \$12,000 per year depending on the scope of the services provided, complexity, time involvement, number and type of accounts, number of objectives, number of individuals, ongoing administrative needs, and/or other miscellaneous requirements.

We reserve the right to charge less or more for engagements where deemed appropriate. Many long-term clients pay lower fees than the current standard rates. We may change fees in response to operational efficiency and to maintain quality client service. Any increase or decrease in the fee requires prior notice to you.

Retainer fees are payable quarterly in arrears. If service begins after the start of a quarter, fees are prorated accordingly. With your authorization, unless other arrangements are made, fees are normally debited directly from your account(s).

Item 6 – Performance-Based Fees and Side-by-Side Management

We do not have any performance-based fee arrangements. “Side-by-Side Management” refers to when the same firm manages accounts that are billed based on a percentage of assets under management and at the same time manages other accounts for which fees are assessed on a performance fee basis. Because we have no performance-based fee accounts, we have no Side-by-Side management.

Item 7 - Types of Clients

We serve individuals, high-net-worth individuals, associated trusts, estates and charitable organizations.

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

METHODS OF ANALYSIS

In accordance with the IPS, our client portfolios are primarily comprised of passive or index mutual funds offered by companies such as Dimensional Fund Advisors (“DFA”), Vanguard, Fidelity, Charles Schwab, and others, as well as exchange traded funds (ETFs) to a lesser degree if/when appropriate. DFA funds generally are available for investment only by clients of registered investment advisers, and all investments are subject to approval of the adviser. This means you may not be able to make additional investments in DFA funds if your agreement with us is terminated, except through another adviser authorized by DFA.

Mutual funds and ETFs are generally evaluated and selected based on a variety of criteria, including, as applicable and without limitation: investment philosophy, expense ratio and other costs, tax characteristics, risk exposures, fund manager reputation and history, and other factors.

Fixed income investments are primarily used to diversify equity investment risk and volatility, but also as a strategic investment, as an instrument to fulfill liquidity or income needs in a portfolio, or to add a component of capital preservation. We will generally evaluate and select bond mutual funds, bond ETFs, and/or individual bonds based on a number of factors including, without limitation, credit risk, term risk, issuer, or fund manager.

INVESTMENT STRATEGIES

We invest each portfolio in accordance with the IPS that has been developed specifically for each client. Securities are purchased with the expectation that the value of those securities will appreciate over a relatively long period of time, generally greater than one year.

We will invest your assets based on the following principles:

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- Markets are efficient, and securities are priced fairly
- Risk and return are directly related. Risk premiums determine expected return.
- Investors should not *expect* return from speculative risk.
- Portfolio structure (asset allocation) is the primary determinant of performance for a broadly-diversified portfolio.
- Cost and performance tend to be inversely related.

We do not engage in market forecasting, market timing, or stock picking. Our philosophy embraces the tenets of Modern Portfolio Theory and the Efficient Markets Hypothesis. We believe an efficient and cost-effective method of implementing a portfolio structured around priced risk premiums is to use passively-managed funds. The use of actively-managed funds is not recommended because these funds may have holdings that vary across dimensions of risk, making portfolio structure difficult to maintain.

Our goal is to capture market-driven returns commensurate with your chosen level of risk. We should be judged by the ability to maintain your asset allocation to its intended structure, avoid unnecessary costs and taxation, and by the quality of our advice.

For ongoing monitoring and portfolio rebalancing, we review your portfolio on a regular basis (at least quarterly) and rebalance to the intended allocation on a contingent basis. In general, contingent rebalancing relies on an event to trigger the process. That event is typically a cash deposit or withdrawal or when an asset class deviates significantly from the intended target percentage. "Significantly" most often means a deviation of 20% on a relative basis or 5% on an absolute basis, but subject to the client's tax and risk circumstances. We believe the purpose of rebalancing is to maintain portfolio structure, not to enhance returns, and that performance, on average, is directly attributed to a client's exposure to systematic risk premiums. Rebalancing helps maintain risk consistency.

RISK OF LOSS

While we seek to diversify your investment portfolio across various asset classes consistent with your IPS to reduce risk of loss, all investment portfolios are subject to risks. Accordingly, there can be no assurance that your investment portfolio will be able to fully meet its investment objectives and goals, or that investments will not lose money. Below is a description of several of the principal risks that client investment portfolios face.

Management Risks. While we manage client investment portfolios based on our experience, research and proprietary methods, the value of client investment portfolios will change daily based on the performance of the underlying securities in which they are invested. Accordingly, client investment portfolios are subject to the risk that we allocate client assets to individual securities and/or asset classes that are adversely affected by unanticipated market movements, and the risk that our specific investment choices could underperform their relevant benchmarks.

Risks of Investments in Mutual Funds, ETFs and Other Investment Pools. As described above, we may invest client portfolios in mutual funds, ETFs and other investment pools (“pooled investment funds”). Investments in pooled investment funds are generally less risky than investing in individual securities because of their diversified portfolios; however, these investments are still subject to risks associated with the markets in which they invest. In addition, pooled investment funds’ success will be related to the skills of their managers and their performance in managing their funds. Pooled investment funds are also subject to risks due to regulatory restrictions applicable to registered investment companies under the Investment Company Act of 1940.

Equity Market Risks. We will generally invest portions of client assets directly into equity investments, primarily in pooled investment funds that invest in the public stock markets. As noted above, while pooled investments have diversified portfolios that may make them less risky than investments in individual securities, funds that invest in stocks and other equity securities are nevertheless subject to the risks of stock markets. These risks include, without limitation, the risks that stock values will decline due to daily fluctuations in the markets, and that stock values will decline over longer periods (e.g., bear markets) due to general market declines in the stock prices for all companies, regardless of any individual security’s prospects.

Fixed Income Risks. We may invest portions of client assets directly into fixed income instruments, such as bonds and notes, or may invest in pooled investment funds that invest in bonds and notes. While investing in fixed income instruments, either directly or through pooled investment funds, is generally less volatile than investing in stock (equity) markets, fixed income investments nevertheless are subject to risks. These risks include, without limitation, interest rate risks (risks that changes in interest rates will devalue the investments), credit risks (risks of default by borrowers), or maturity risk (risks that bonds or notes will change value from the time of issuance to maturity).

Foreign Securities Risks. We may invest portions of client assets into pooled investment funds that invest internationally. While foreign investments are important to the diversification of client investment portfolios, they carry risks that may be different from U.S. investments. For example, foreign investments may not be subject to uniform audit, financial reporting or disclosure standards, practices or requirements comparable to those found in the U.S. Foreign investments are also subject to foreign withholding taxes and the risk of adverse changes in investment or exchange control regulations. Finally, foreign investments may involve currency risk, which is the risk that the value of the foreign security will decrease due to changes in the relative value of the U.S. dollar and the security’s underlying foreign currency.

Item 9 - Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to a client’s evaluation of us or the integrity of our management. We have no disciplinary events to report.

Item 10 - Other Financial Industry Activities and Affiliations

Neither Altiora nor its representatives are registered as or have pending applications to become a broker/dealer or as representatives of a broker/dealer.

Neither Altiora nor its representatives are registered as or have pending applications to become a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor.

Neither Altiora nor its representatives have any material relationships to this advisory business that would present a possible conflict of interest.

We do not utilize nor select other advisors or third-party managers. All assets are managed by us.

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

CODE OF ETHICS AND PERSONAL TRADING

We have adopted a Code of Ethics (“the Code”), the full text of which is available to you upon request. Our Code has several goals. First, the Code is designed to assist us in complying with applicable laws and regulations governing our investment advisory business. Under the Investment Advisers Act of 1940, we owe fiduciary duties to our clients. Pursuant to these fiduciary duties, the Code requires persons associated with us (managers, officers and employees) to act with honesty, good faith and fair dealing in working with clients. In addition, the Code prohibits such associated persons from trading or otherwise acting on insider information.

Next, the Code sets forth guidelines for professional standards for our associated persons. Under the Code’s Professional Standards, we expect our associated persons to put the interests of our clients first, ahead of personal interests. In this regard, our associated persons are not to take inappropriate advantage of their positions in relation to our clients.

Third, the Code sets forth policies and procedures to monitor and review the personal trading activities of associated persons. From time to time, our associated persons may invest in the same securities recommended to clients. Under our Code, we have adopted procedures designed to reduce or eliminate conflicts of interest that this could potentially cause. The Code’s personal trading policies include procedures for limitations on personal securities transactions of associated persons, reporting and review of such trading and pre-clearance of certain types of personal trading activities. These policies are designed to discourage and prohibit personal trading that would disadvantage clients. The Code also provides for disciplinary action as appropriate for violations.

PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS

Because client accounts are generally invested exclusively in open-end mutual funds and ETFs, there is little opportunity for a conflict of interest between personal trades by our associated persons and trades in client accounts, even when such accounts invest in the same securities. However, in the event of other identified potential trading conflicts of interest, our goal is to place client interests first.

Consistent with the foregoing, we maintain policies regarding participation in initial public offerings (IPOs) and private placements to comply with applicable laws and avoid conflicts with client transactions.

Finally, if associated persons trade with client accounts (i.e., in a bundled or aggregated trade), and the trade is not filled in its entirety, the associated person's shares will be removed from the block, and the balance of shares will be allocated among client accounts in accordance with our written policy.

Item 12 - Brokerage Practices

BEST EXECUTION AND BENEFITS OF BROKERAGE SELECTION

When given discretion to select the brokerage firm that will execute orders in client accounts, we seek "best execution" for client trades, which is a combination of many factors, including, without limitation, quality of execution, services provided and commission rates. Therefore, we may use or recommend the use of brokers who do not charge the lowest available commission in the recognition of research and securities transaction services, or quality of execution. Research services received with transactions may include proprietary or third-party research (or any combination) and may be used in servicing any or all of our clients. Therefore, research services received may not be used for the account for which the transaction was placed.

We recommend that clients establish brokerage accounts with Charles Schwab & Co., Inc. (Schwab), Fidelity Institutional Wealth Services (Fidelity), and/or TD Ameritrade Institutional, a division of TD Ameritrade Inc. ("TD Ameritrade). Schwab, Fidelity and TD Ameritrade (collectively "the Custodians") are qualified custodians that maintain custody of clients' assets. Each Custodian is a FINRA-registered broker-dealer, member SIPC. Although we may recommend that you establish accounts at the Custodians, it is ultimately your decision to custody assets with the Custodians. We are independently owned and operated and are not affiliated with the Custodians.

For clients' accounts that are maintained with the Custodians, the Custodians generally do not charge you separately for custody services but are compensated by charging you commissions or other fees on trades that they execute or that settle into your account. Certain trades may not incur commissions or transaction fees. In addition, the Custodians are compensated by earning interest on the uninvested cash in your account(s). The Custodians also charge you a flat dollar amount as a "prime broker" or "trade away" fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold

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are deposited (settled) into your account. These fees are in addition to the commissions or other compensation you pay the executing broker/dealer. Because of this, in order to minimize your trading costs, we have your particular custodian(s) execute most trades for your account. We have determined that having the custodian of your account execute most trades is consistent with our duty to seek best execution of your trades.

The Custodians provide us with access to their institutional trading, custody, reporting and related services, which are typically not available to the Custodians' retail investors. The Custodians also make available various support services. Some of those services help us manage or administer client accounts while others help us manage our business. These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them. These services are not soft dollar arrangements but are part of the institutional platform offered by the Custodians. The Custodians' brokerage services include the execution of securities transactions, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

The Custodians' products and services that assist us in managing and administering clients' accounts include software and other technology that (i) provide access to client account data (such as trade confirmations and account statements); (ii) facilitate trade execution and allocate aggregated trade orders for multiple client accounts; (iii) provide pricing and other market data; (iv) facilitate payment of our fees from our clients' accounts; and (v) assist with back-office functions, recordkeeping and client reporting.

The Custodians also offer other services intended to help us manage and further develop our business enterprise. These services may include: (i) technology compliance, legal and business consulting; (ii) publications and conferences on practice management and business succession; and (iii) access to employee benefits providers, human capital consultants and insurance providers. The Custodians may make available, arrange and/or pay third-party vendors for the types of services rendered to us. The Custodians may discount or waive fees they would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to us. The Custodians may also provide other benefits such as educational events or occasional business entertainment of our personnel. In evaluating whether to recommend that you custody your assets at the Custodians, we may take into account the availability of some of the foregoing products and services and other arrangements as part of the total mix of factors we consider and not solely on the nature, cost or quality of custody and brokerage services provided by the Custodians, which creates a conflict of interest. Please note, in accordance with our fiduciary duties, we endeavor to always act in your best interest.

DIRECTED BROKERAGE

You may direct us to use a particular broker for custodial or transaction services on behalf of your portfolio. In directed brokerage arrangements, you are responsible for negotiating the commission rates and other fees to be paid to the broker. Accordingly, if you direct brokerage, you should consider whether such designation may result in certain costs or disadvantages to you, either because you may pay higher commissions or obtain less favorable execution, or the designation limits your available investment options.

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The arrangements that we have with the Custodians are designed to maximize efficiency and to be cost effective. By directing brokerage arrangements, you acknowledge that these economies of scale and levels of efficiency are generally compromised when alternative brokers are used. While every effort is made to treat clients fairly over time, the fact that you choose to use the brokerage and/or custodial services of these alternative service providers can result in a certain degree of delay in executing trades for your account(s) and otherwise adversely affect management of your account(s).

By directing us to use a specific broker or dealer, clients who are subject to ERISA confirm and agree with Altiora that they have the authority to make the direction, that there are no provisions in any client or plan document which are inconsistent with the direction, that the brokerage and other goods and services provided by the broker or dealer through the brokerage transactions are provided solely to and for the benefit of the client's plan, plan participants and their beneficiaries, that the amount paid for the brokerage and other services have been determined by the client and the plan to be reasonable, that any expenses paid by the broker on behalf of the plan are expenses that the plan would otherwise be obligated to pay, and that the specific broker or dealer is not a party in interest of the client or the plan as defined under applicable ERISA regulations.

AGGREGATED TRADE POLICY

We typically direct trading in your account(s) as and when trades are appropriate based on your IPS, without regard to activity in other client accounts. However, from time to time, we may aggregate trades for multiple client accounts, most often when these accounts are being directed to sell the same securities. If such an aggregated trade is not completely filled, we will allocate shares received (in an aggregated purchase) or sold (in an aggregated sale) across participating accounts on a pro rata or other fair basis; provided, however, that any participating accounts that are owned by Altiora or its officers, directors, or employees will be excluded first.

Item 13 - Review of Accounts

Managed portfolios are reviewed at least quarterly but may be reviewed more often upon your request, upon receipt of information material to the management of the portfolio, or at any time we deem such review necessary or advisable. These factors generally include, but are not limited to, the following: change in your general circumstances (marriage, divorce, retirement); or economic, political or market conditions. Derek Tinnin, our Managing Member, reviews all accounts.

Account custodians are responsible for providing monthly or quarterly account statements which reflect the positions (and current pricing) in each account as well as transactions in each account, including fees paid from an account. Account custodians also provide prompt confirmation of all trading activity, and year-end tax statements, such as 1099 forms. In addition, we provide at least a quarterly report for each managed portfolio.

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This written report normally includes a summary of portfolio holdings and performance results. Additional reports are available at your request.

Item 14 - Client Referrals and Other Compensation

As noted above, we receive an economic benefit from the Custodians in the form of support products and services they make available to us and other independent investment advisors whose clients maintain accounts at the Custodians. These products and services, how they benefit our firm, and the related conflicts of interest are described in Item 12 - Brokerage Practices. The availability of the Custodians' products and services to us is based solely on our participation in the programs and not in the provision of any particular investment advice. Neither the Custodians nor any other party is paid to refer clients to us.

Item 15 - Custody

Schwab, TD Ameritrade and/or Fidelity are the custodians of nearly all of our clients' accounts. From time to time, however, clients may select an alternate broker to hold accounts in custody. In any case, it is the custodians' responsibility to provide you with confirmations of trading activity, tax forms and at least quarterly account statements. You are advised to review this information carefully, and to notify us of any questions or concerns. You are also asked to promptly notify us if the custodian fails to provide statements on each account held.

From time to time and in accordance with our agreement with clients, we will provide additional reports. The account balances reflected on these reports should be compared to the balances shown on the brokerage statements to ensure accuracy. At times, there may be small differences due to the timing of dividend reporting, pending trades or other similar issues.

Item 16 - Investment Discretion

As described in Item 4 - Advisory Business, we will accept clients on either a discretionary or non-discretionary basis. For *discretionary accounts*, you will execute a Limited Power of Attorney ("LPOA") giving us the authority to carry out various activities in the account, generally including the following: trade execution; the ability to request checks on your behalf; and, the withdrawal of advisory fees directly from the account. We then direct investment of your portfolio using our discretionary authority. You may limit the terms of the LPOA to the extent consistent with your agreement with us and the requirements of your custodian.

For *non-discretionary* accounts, you also generally execute an LPOA, which allows us to carry out trade recommendations and approved actions in the portfolio. However, in accordance with our agreement with you, we do not implement trading recommendations or other actions in the account unless and until you have

approved the recommendation or action. As with discretionary accounts, you may limit the terms of the LPOA, subject to our agreement with you and the requirements of your custodian.

Item 17 - Voting Client Securities

As a policy and in accordance with our agreement, we do not vote proxies related to securities held in your account(s). The custodian of the account will normally provide proxy materials directly to you. You may contact us with questions relating to proxy procedures and proposals; however, we generally do not research particular proxy proposals.

Item 18 - Financial Information

We do not require nor solicit prepayment of more than \$500 in fees per client, six months or more in advance, and therefore have no disclosure with respect to this item.

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Exhibit A – Brochure Supplement Form ADV Part 2B

Item 1 – Cover Page

Derek R. Tinnin, CFP®
CRD# 5394225

Altiora Financial Group, LLC

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3825 Edwards Road, Suite 103
Cincinnati, Ohio 45209

March 9, 2020

This Brochure Supplement provides information about Derek R. Tinnin, and supplements the Altiora Financial Group, LLC (Altiora) Brochure. Please contact us at (513) 652-5776 if you did not receive our Brochure, or if you have any questions about the contents of this Supplement.

Additional information about Derek is available at www.AdviserInfo.sec.gov.

Item 2 - Educational Background and Business Experience

Derek R. Tinnin (year of birth 1967) is Co-founder and Managing Member of Altiora. Derek began his financial career in 1992 with Cincinnati Financial Corporation, serving as a Commercial Underwriter in the property and casualty insurance division, an Advanced Planning Consultant in the life insurance division, an Investment Analyst with the company's institutional investment team, and Investment Advisor Representative with the company's wholly-owned Registered Investment Advisor firm, CinFin Capital Management. In 1999, Derek joined Advanced Capital Strategies (later renamed Truepoint Capital), as an Investment Advisor Representative, with a primary focus on portfolio management. In 2007, Derek founded Purpose Wealth Management, LLC, a registered investment adviser, where he remained until he co-founded Altiora Group, LLC with Pamela Clark in 2014. In 2018, two distinct and independent entities were created from Altiora Group, LLC. Derek founded Altiora Financial Group, LLC to focus exclusively on investment and financial advisory services, and Pamela Clark founded Generations Wealth, LLC to offer income tax and Personal CFO services in addition to investment and financial planning services. Although the companies are separate, Derek is retained by Generations Wealth to provide consulting for their portfolio management process.

Derek received a BBA in Economics from Anderson University 1990. He obtained the CERTIFIED FINANCIAL PLANNER™ certification* in 1997.

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* The CFP® certification is granted by Certified Financial Planner Board of Standards, Inc. (CFP Board). To attain the certification, the candidate must complete the required educational, examination, experience and ethics requirements set forth by CFP Board. Certain designations, such as the CPA, CFA and others may satisfy the education component, and allow a candidate to sit for the CFP® Certification Examination. A comprehensive examination tests the candidate's ability to apply financial planning knowledge to client situations. Qualifying work experience is also required for certification. Qualifying experience includes work in the delivery of the personal financial planning process to clients, the direct support or supervision of others in the personal financial planning process, or teaching all, or any portion, of the personal financial planning process. CFP® professionals must complete 30 hours of continuing education accepted by CFP Board every two years.

Item 3 - Disciplinary Information

Advisers are required to disclose any material facts regarding certain legal or disciplinary events that would be material to your evaluation of an adviser; however, Derek has no such disciplinary information to report.

Item 4 - Other Business Activities

Derek is also an Investment Adviser Representative of Generations Wealth, LLC, where he provides consulting services to assist with their portfolio management process.

Item 5 - Additional Compensation

Other than as stated above, Derek has no other income to disclose.

Item 6 - Supervision

Derek Tinnin is a Managing Member and sole owner of Altiora and serves as the firm's Chief Compliance Officer. As Chief Compliance Officer, Derek is responsible for providing compliance supervisory oversight to the firm. He may be contacted at (513) 652-5776.

End of Form ADV Part 2B