Item 1: Cover Page

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Form ADV Part 2A - Firm Brochure
Dated: June 12th, 2023

This Brochure provides information about the qualifications and business practices of ALBA Financial LLC, "ALBAFin". If you have any questions about the contents of this Brochure, please contact us at (402) 305-6732. 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. ALBA Financial LLC is registered as an Investment advisor with the State of Iowa. Registration of an Investment advisor does not imply any level of skill or training. Additional information about ALBAFin is available on the SEC's website at www.advisorinfo.sec.gov, which can be found using the firm's identification number, 327309.

Item 2: Material Changes

There are no material changes to report.

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DESCRIPTION OF ADVISORY FIRM

ALBA Financial LLC is registered as an Investment advisor with the State of Iowa. We were founded in June 2023. Robert Dodson is the principal owner of ALBAFin. ALBAFin is a new entity, it currently reports $0.00 Assets Under Management.

TYPES OF ADVISORY SERVICES

ALBA Financial LLC's ("ALBAFin" or "Advisor") principal service is providing fee-based investment advisory services and financial planning services.

INVESTMENT MANAGEMENT SERVICES

This service involves managing individually tailored investment portfolios on a discretionary basis. Our firm provides continuous advice to a client regarding the investment of client funds based on the individual needs of the client. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, we develop a client's personal investment policy or an investment plan with an asset allocation target and create and manage a portfolio based on that policy and allocation targets.

We will also review and discuss a client's prior investment history, as well as family composition and background. Account supervision is guided by the stated objectives of the client (e.g., maximum capital appreciation, growth, income, or growth, and income), as well as tax considerations. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors. We will meet with the client on at least an annual basis to discuss changes in their personal or financial situation, suitability, and any new or revised restrictions to be applied to the account.

Fees pertaining to this service are outlined in Item 5 of this brochure.

- Primary investment management offering We offer to client's management of their investments in-house as the typical standard option. This includes analyzing assessment answers regarding risk, capacity for loss, ethical considerations and other goal/risk factors before creating a portfolio.
- Use of Third-Party Managers, Outside Managers, or Sub-Advisors (TAMPs) We can offer the use of Third Party Managers, Outside Managers, or Sub-Advisors (TAMPs) for portfolio management services. We can assist Clients in selecting an appropriate allocation model, completing the Outside Manager's investor profile questionnaire, interacting with the Outside Manager and reviewing the Outside Manager. Our review process and analysis of outside managers is further discussed in Item 8 of this Form ADV Part 2A. Additionally, we will meet with the Client on a periodic basis to discuss changes in their personal or financial situation, suitability, and any new or revised restrictions to be applied to the account. Fees pertaining to this service are outlined in Item 5 of this brochure.

FINANCIAL PLANNING REPORTS AND PROJECT BASED FINANCIAL PLANNING

Services We provide project based financial planning reports and services on a holistic basis or on specific topics such as retirement planning, risk management, college savings, cash flow, debt management, work benefits, and estate and incapacity planning.

Financial planning involves an evaluation of a client's current and future financial state by using currently known variables to predict future cash flows, asset values, and withdrawal plans. The key defining aspect of financial planning is that through the financial planning process, all questions, information, and analysis will be considered as they affect and are affected by the entire financial and life situation of the Client. Clients purchasing this service will receive a written or an electronic report, providing the Client with a detailed financial plan designed to achieve his or her stated financial goals and objectives.

In general, the financial plan will address any or all the following areas of concern. The Client and ALBAFin will work together to select specific areas to cover. These areas may include, but are not limited to, the following:

- **Business Planning:** We provide consulting services for Clients who currently operate their own business, are considering starting a business, or are planning for an exit from their current business. Under this type of engagement, we work with you to assess your current situation, identify your objectives, and develop a plan aimed at achieving your goals.
- **Cash Flow and Debt Management:** We will conduct a review of your income and expenses to determine your current surplus or deficit along with advice on prioritizing how any surplus should be used or how to reduce expenses if they exceed your income. Advice may also be provided on which debts to pay off first based on factors such as the interest rate of the debt and any income tax ramifications. We may also recommend what we believe to be an appropriate cash reserve that should be considered for emergencies and other financial goals, along with a review of accounts (such as money market funds) for such reserves, plus strategies to save desired amounts.

- **College Savings:** Includes projecting the amount that will be needed to achieve college or other postsecondary education funding goals, along with advice on ways for you to save the desired amount. Recommendations as to savings strategies are included, and, if needed, we will review your financial picture as it relates to eligibility for financial aid or the best way to contribute to grandchildren (if appropriate).
- **Employee Benefits Optimization:** We will provide review and analysis as to whether you, as an employee, are taking the maximum advantage possible of your employee benefits. If you are a business owner, we will consider and/or recommend the various benefit programs that can be structured to meet both business and personal retirement goals.
- **Estate Planning:** This usually includes an analysis of your exposure to estate taxes and your current estate plan, which may include whether you have a will, powers of attorney, trusts, and other related documents. Our advice also typically includes ways for you to minimize or avoid future estate taxes by implementing appropriate estate planning strategies such as the use of applicable trusts. We always recommend that you consult with a qualified attorney when you initiate, update, or complete estate planning activities. We may provide you with contact information for attorneys who specialize in estate planning when you wish to hire an attorney for such purposes. From time-to-time, we will participate in meetings or phone calls between you and your attorney with your approval or request.
- **Financial Goals:** We will help Clients identify financial goals and develop a plan to reach them. We will identify what you plan to accomplish, what resources you will need to make it happen, how much time you will need to reach the goal, and how much you should budget for your goal.
- **Insurance:** Review of existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home, and automobile.
- **Investment Analysis:** This may involve developing an asset allocation strategy to meet Clients' financial goals and risk tolerance, providing information on investment vehicles and strategies, reviewing employee stock options, as well as assisting you in establishing your own investment account at a selected broker/dealer or custodian. The strategies and types of investments we may recommend are further discussed in Item 8 of this brochure.
- **Retirement Planning:** Our retirement planning services typically include projections of your likelihood of achieving your financial goals, typically focusing on financial independence as the primary objective. For situations where projections show less than the desired results, we may make recommendations, including those that may impact the original projections by adjusting certain variables (e.g., working longer, saving more, spending less, taking more risk with investments). If you are near retirement or already retired, advice may be given on appropriate distribution strategies to minimize the likelihood of running out of money or having to adversely alter spending during your retirement years.
- **Risk Management:** A risk management review includes an analysis of your exposure to major risks that could have a significant adverse impact on your financial picture, such as premature death, disability, property and casualty losses, or the need for long-term care planning. Advice may be provided on ways to minimize such risks and about weighing the costs of purchasing insurance versus the benefits of doing so and, likewise, the potential cost of not purchasing insurance ("self-insuring").
- **Tax Planning Strategies:** Advice may include ways to minimize current and future income taxes as a part of your overall financial planning picture. For example, we may make recommendations on which type of account(s) or specific investments should be owned based in part on their "tax efficiency," with the consideration that there is always a possibility of future changes to federal, state or local tax laws and rates that may impact your situation.

We recommend that you consult with a qualified tax professional before initiating any tax planning strategy, and we may provide you with contact information for accountants or attorneys who specialize in this area if you wish to hire someone for such purposes.

We will participate in meetings or phone calls between you and your tax professional with your approval.

This service does not include fees for Investment Management Services.

ONGOING FINANCIAL PLANNING

This service involves working one-on-one with a planner over an extended period. By paying a fixed monthly fee, Clients get to work with a planner who will work with them to develop and implement a plan.

A Client will be taken through financial behaviors, habits, mindset, establishing their goals and values around money. They will be required to provide information to help complete the following areas of analysis: net worth, cash flow, insurance, credit scores/reports, employee benefit, retirement planning, insurance, investments, college planning, and estate planning.

The Client's financial situation and goals will be monitored throughout the year and follow-up phone calls (the regularity of which agreed at the out-set) and emails will be made to the Client to confirm that any agreed upon action steps have been carried out. On an annual basis, there will be a full review of the financial plan to ensure accuracy and ongoing appropriateness. The Client will be provided with a summary of financial planning work completed annually, in arrears, and analysis of areas discussed and plans to move forward, either electronically or written.

This service does not include fees for Investment Management Services.

EDUCATIONAL SEMINARS AND SPEAKING ENGAGEMENTS

We may provide seminars on an “as announced” basis for groups seeking general advice on investments and other areas of personal finance. The content of these seminars will vary depending upon the needs of the attendees. These seminars are purely educational in nature and do not involve the sale of any investment products. Information presented will not be based on any individual’s person’s need, nor does ALBAFin provide individualized investment advice to attendees during these seminars.

CLIENT TAILORED SERVICES AND CLIENT IMPOSED RESTRICTIONS

We offer the same suite of services to all of our clients. However, specific client financial plans and their implementation are dependent upon the client Investment Policy Statement which outlines each client’s current situation (income, tax levels, and risk tolerance levels) and is used to construct a client-specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets.

PERSONS RESIDING OUTSIDE OF THE UNITED STATES

Services for client’s residing outside of the United States may be restricted or limited due to custodial rules or other factors. Financial planning, tax advice or estate planning review services and advice shall be limited in scope to those matters governed by the laws of the United States and its state and local jurisdictions. Client’s MUST have an exposure to the USA via residency, citizenship or other way. Investment options and strategies may differ from our typical recommendations, including but not limited to, restricted trading and customer service windows due to foreign exchange operating hours and foreign tax treatment of investment transactions in the United States.

In addition, foreign laws or requirements may also impact our ability to service accounts or require additional disclosure as determined on an individual country basis. The client will be responsible for satisfying all legal and tax reporting requirements of both the United States and all applicable foreign governments. Any person located outside of the United States who wishes to open an account, or existing client who locates outside of the United States, will be subject to the custodian’s policy regarding that country (including their right to decline to open or maintain the account), and all applicable customer identification and anti-money laundering regulations.

ALBAFin reserves the right, in its sole discretion, to decline an engagement with any prospective client outside of the United States, or terminate an engagement with an existing client, if they move outside of the United States into a jurisdiction ALBAFin does not wish to continue with a relationship. The client will be given 60 days notice, and the client is to give ALBAFin 30-days notice of relocation.

WRAP FEE PROGRAMS

We do offer and participate in a wrap fee program. Please refer to Appendix 1 of our Part 2A, Wrap Fee Brochure.

Our wrap fee and non-wrap fee accounts are managed on an individualized basis according to the client’s investment objectives, financial goals, risk tolerance, etc. We do not manage wrap fee accounts in a different fashion than non-wrap fee accounts.

Item 5: Fees and Compensation

Please note, unless a Client has received the firm's Disclosure Brochure at least 48 hours prior to signing the investment advisory contract, the investment advisory contract may be terminated by the Client within five (5) business days of signing the contract without incurring any advisory fees. How we are paid depends on the type of advisory service we are performing. Please review the fee and compensation information below. ALBAFin treats the custodial and securities execution fees charged by the custodian and executing broker-dealer in one of two ways.

- Either the client is responsible for all costs and will pay them directly out of the account,
- or ALBAFin's management fee will include all such costs and they will be paid by ALBAFin.

Therefore, in the former method, the client will pay the management fee solely for advisory services and will also directly pay any transaction costs assessed by the executing broker-dealer or custodian, such as commissions and transaction fees.

The latter method is typically characterized as a "wrap fee," where the management fee includes the investment advisory services as well as all transaction costs and the client pays only that management fee and no other costs concerning the trading and maintaining of the account. Clients in the wrap fee accounts, with the transaction and custody costs included, may pay a higher Management Fee than those where those costs are not included in the fee.

The specific arrangement for each client will be negotiated and defined in the investment advisory contract signed by each client.

INVESTMENT MANAGEMENT SERVICES - WRAP FEES

Our standard wrap-fee program fee schedule is based upon the market value of the assets under management and is calculated as follows:

ACCOUNT VALUE $	ADVISORY FEE %
$0.00-$299,999	1.60%
$300,000-$499,999	1.35%
$500,000-$749,999	1.25%
$750,000-$999,999	1.10%
$1,000,000+	1.00%

The annual fees are negotiable and are pro-rated and paid in arrears on a monthly basis, as agreed with the client, and based on the value of portfolio assets of the account managed by the ALBAFin as of the last day of business of the month or quarter.

New account fees will be prorated from the inception of the account to the end of the month or quarter.

Altruist accounts: Advisory fees are directly debited from client accounts. Accounts initiated or terminated during a calendar month will be charged a prorated fee based on the amount of time remaining in the billing period. An account may be terminated with written notice at least 15 calendar days in advance. Since fees are paid in arrears, no rebate will be needed upon termination of the account.

Please note: the fees described above are inclusive of transaction fees or any other fees assessed by the broker-dealer or custodian.

INVESTMENT MANAGEMENT SERVICES - NON WRAP FEE

Our standard advisory fee is based on the market value of the assets under management and is calculated as follows:

ACCOUNT VALUE $	ADVISORY FEE %
$0.00-$299,999	1.50%
$300,000-$499,999	1.30%
$500,000-$749,999	1.20%
$750,000-$999,999	1.00%
$1,000,000+	0.90%

The annual fees are negotiable depending on other services received, and are pro-rated and paid in arrears either on a monthly basis unless agreed otherwise with the client, and based on the value of portfolio assets of the account managed by the ALBAFin as of the last day of business of the month.

New account fees will be prorated from the inception of the account to the end of the month or quarter.

Altruist accounts: Advisory fees are directly debited from client accounts. Accounts initiated or terminated during a calendar month will be charged a prorated fee based on the amount of time remaining in the billing period. An account may be terminated with written notice at least 15 calendar days in advance. Since fees are paid in arrears, no rebate will be needed upon termination of the account.

FINANCIAL PLANNING REPORTS AND PROJECT BASED FINANCIAL PLANNING FIXED FEES

Financial Planning Reports and Project Based Financial Planning will be offered on a fixed fee basis.

The fixed fee will be agreed upon before the start of any work. Financial Planning Reports for US domestic individuals and families:

- The fee can range between $1,500 per individual, up to $10,000 for complex cases for a family/trust. The fee is determined after a conversation confirming what is to be included and dependent upon complexity of subject matter and consideration points.

All clients can choose to split the fee payment over 6 months, with the final payment due at completion of work, however, ALBAFin will not bill an amount above $500.00 more than 6 months in advance.

Fees for this service may be paid by electronic funds transfer via AdvicePay software or Quickbooks invoice – secure payment portals. In the event of termination any prepaid but unearned fees will be refunded to the Client and any completed deliverables of the project will be provided to the Client and no further fees will be charged. We will not accept cash payments via any other method. If the client should wish, they can pay by check at the discretion of the firm.

ONGOING FINANCIAL PLANNING

Ongoing Financial Planning consists of a one-time setup fee of $295, and an ongoing fee that is paid monthly of $195 for a period of not less than 6 months. The fee may be negotiable in certain cases. Fees for this service may be paid by electronic funds transfer via AdvicePay or Quickbooks invoice and must be set up on a recurring basis.

This service may be terminated with 30 days' notice. Upon termination of any agreement, the fee will be prorated and any unearned fee will be refunded to the Client.

FINANCIAL PLANNING HOURLY FEES

Hourly Financial Planning engagements are offered at an hourly rate of $295 per hour, depending on complexity. The fee may be negotiable in certain cases and is due at the completion of the engagement. In the event of early termination by the Client, any fees for the hours already worked will be due. Fees for this service may be paid by electronic funds transfer or check.

PERSONS RESIDING OUTSIDE OF THE UNITED STATES

Services for client's residing outside of the United States may be restricted or limited due to custodial rules or other factors. Fees range from $4,000 - $12,500 for any Financial Planning report or Project discussed and agreed upon in advance with the client once ALBAFin has been given the clients complete situational information. Fees are split into equal payments for up to 6 months.

Financial planning, tax advice or estate planning review services and advice shall be limited in scope to those matters governed by the laws of the United States and its state and local jurisdictions.

Investment options and strategies may differ from our typical recommendations, including but not limited to, restricted trading and customer service windows due to foreign exchange operating hours and foreign tax treatment of investment transactions in the United States. In addition, foreign laws or requirements may also impact our ability to service accounts or require additional disclosure as determined on an individual country basis.

The client will be responsible for satisfying all legal and tax reporting requirements of both the United States and all applicable foreign governments.

EDUCATIONAL SEMINARS AND/OR SPEAKING ENGAGEMENTS

Seminars are offered to organizations and the public on a variety of financial topics. Fees range from free to $1,000 per seminar or free to $100 per participant. Half of the fees are due prior to the engagement, and the other half is to be paid the day of, no later than the conclusion of the Seminar. The fee range is based on the content, amount of research conducted, the number of hours of preparation needed, and the number of attendees. In the event of inclement weather or flight cancellation, the Speaker shall make all reasonable attempts to make alternative travel arrangements to arrive in time for the presentation. If travel proves impossible, or the event is otherwise canceled, the Speaker's fee is waived, but the Client will still be responsible for reimbursement of any nonrefundable travel expenses already incurred.

In the event that the Client decides to cancel or change the date of the event for any reason besides weather or similar unforeseen causes, the Client will still be responsible for reimbursement of any non-refundable travel expenses already incurred, and will provide payment for 50% of the Speaker's fee if the cancellation occurs within 30 days of the event. In the event the Speaker must cancel due to health or similar unforeseen circumstances, the Speaker will make all attempts to find a reasonable alternative engagement date and will absorb any incremental additional costs for obtaining alternative travel arrangements. If an alternative date cannot be obtained, the Client will not be responsible for any travel costs already incurred by the Speaker or any portion of the Speaker's fee.

Educational Seminars and Speaking Engagements may be provided pro-bono at ALBAFin's discretion.

OTHER TYPES OF FEES AND EXPENSES

For clients that utilize our non-wrap Investment Management services, our fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which may be incurred by the client.

- Clients may incur certain charges imposed by custodians, brokers, and other third parties such as custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual fund and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to our fee, and we shall not receive any portion of these commissions, fees, and costs.

For clients that utilize our Wrap Fees Non-Discretionary and Discretionary Investment Management Services, our fees are inclusive of brokerage commissions, transaction fees, and other related costs and expenses which may be incurred by the client.

- Clients may incur certain charges imposed by custodians, brokers, and other third parties such as custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. (See Form ADV Part 2A Appendix 1 - WRAP Brochure).
- Our custodian may offer mutual fund share classes that are free to transact but carries a higher internal expense for the client. This creates a conflict of interest. It is our firm policy that we will always purchase the share class with the lowest cost for the client, regardless of the cost for us to transact.

Item 12 further describes the factors that we consider in selecting or recommending broker-dealers for client's transactions and determining the reasonableness of their compensation (e.g., commissions).

We do not accept compensation for the sale of securities or other investment products including asset-based sales charges or service fees from the sale of mutual funds.

Item 6: Performance-Based Fees and Side-BySide Management

We do not offer performance-based fees.

Item 7: Types of Clients

We provide financial planning and portfolio management services to:

- individuals,
- high net-worth individuals,
- charitable organizations,
- corporations,
- or other businesses.

We do not have a minimum account size requirement.

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

When we complete an Investment Analysis as part of a financial plan, our approach involves analyzing investment portfolios from the standpoints of diversification, asset allocation and modern portfolio theory, risk factors.

DIVERSIFICATION

Diversification involves investing in companies from many industries, countries, and geographical regions with the goal of reducing or offsetting the risks that each of these factors pose in a portfolio individually. Diversified portfolios are less susceptible to single company, sector, and geographic risks but remain exposed to the systematic risk of the broad market.

SOCIALLY RESPONSIBLE INVESTING: ENVIRONMENTAL, SOCIAL, AND GOVERNANCE

Our Environmental, Social, and Governance (ESG) strategies seek to invest in the securities of companies (or funds containing such securities) that demonstrate one or more positive characteristics concerning environmental, social, and corporate governance ("ESG"). This approach resonates with many who seek to align investment decisions with core values. It is also the Firm's judgment that such strategies will become increasingly effective for generating investment returns as concerns around climate change, equality, and culture become essential to the forward-looking strategies of publicly traded companies. Our approach is to follow the client's requirements following a thorough assessment via a variety of software methods to assess their morals and ethics. We screen individual companies for our single stock portfolios and ETFs and mutual funds to remove or purposefully advocate for the clients goals.

ASSET ALLOCATION AND MODERN PORTFOLIO THEORY (MPT)

Asset Allocation refers to the composition of different kinds of assets such as cash, stocks, and bonds within a portfolio and to the subdivisions within those asset classes such as U.S. or foreign and small or large companies. According to Modern Portfolio Theory, a concept first developed in the 1950s and refined in the years since, different asset classes have different expectations for risk and return, and those expectations can be used to construct a portfolio with the highest expected return for a given level of risk. Modern Portfolio Theory assumes a diversified portfolio, consistent allocation percentages for each asset class, and a long enough time horizon to average out the significant expected variation in investment returns from year to year.

The underlying principles of MPT are:

- Investors are risk averse. The only acceptable risk is that which is adequately compensated by an expected return. Risk and investment return are related and an increase in risk requires an increased expected return.
- Markets are efficient. The same market information is available to all investors at the same time. The market prices every security fairly based upon this equal availability of information.
- The design of the portfolio is more important than the selection of any particular security. The appropriate allocation of capital among asset classes will have far more influence on long-term portfolio performance than the selection of individual securities.
- Investing for the long-term (preferably longer than ten years) becomes critical to investment success because it allows the long-term characteristics of the asset classes to surface.
- Increasing diversification of the portfolio with lower correlated asset class positions can decrease portfolio risk. Correlation is the statistical term for the extent to which two asset classes move in tandem or opposition to one another.

OTHER RISK FACTORS

Risk Factors are measures of the volatility of different types of assets based on their past returns. Academic research has shown that the total risk of an asset or portfolio can be broken down into its exposures to each underlying risk factor. This can be useful for determining a portfolio's exposure to different types of risks, and for evaluating whether a portfolio or fund manager has added or subtracted value beyond what can be explained by total risk exposure. Risk factors are based on past performance and assume a consistent portfolio management style, so they may have limitations for predicting future risk and returns.

USE OF OUTSIDE MANAGERS

We may refer Clients to third-party investment advisors ("outside managers"). Our analysis of outside managers involves the examination of the experience, expertise, investment philosophies, and past performance of the outside managers in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We monitor the manager's underlying holdings, strategies, concentrations, and leverage as part of our overall periodic risk assessment. Additionally, as part of our due diligence process, we survey the manager's compliance and business enterprise risks. A risk of investing with an outside manager who has been successful in the past is that he or she may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in an outside manager's portfolio. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for our Clients. Moreover, as we do not control the manager's daily business and compliance operations, we may be unaware of the lack of internal controls necessary to prevent business, regulatory or reputational deficiencies.

MATERIAL RISKS INVOLVED

All investing strategies we offer involve risk and may result in a loss of your original investment which you should be prepared to bear. Many of these risks apply equally to stocks, bonds, commodities, and any other investment or security. Material risks associated with our investment strategies are listed below:

Market Risk: Market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the value of the investment regardless of the operational success of the issuer's operations or its financial condition.

Strategy Risk: The advisor's investment strategies and/or investment techniques may not work as intended.

Small and Medium Cap Company Risk: Securities of companies with small and medium market capitalizations are often more volatile and less liquid than investments in larger companies. Small and medium cap companies may face a greater risk of business failure, which could increase the volatility of the Client's portfolio.

Turnover Risk: At times, the strategy may have a portfolio turnover rate that is higher than other strategies. A high portfolio turnover would result in correspondingly greater brokerage commission expenses and may result in the distribution of additional capital gains for tax purposes. These factors may negatively affect the account's performance.

Limited markets: Certain securities may be less liquid (harder to sell or buy) and their prices may at times be more volatile than at other times. Under certain market conditions, we may be unable to sell or liquidate investments at prices we consider reasonable or favorable or find buyers at any price.

Concentration Risk: Certain investment strategies focus on particular asset-classes, industries, sectors or types of investment. From time to time these strategies may be subject to greater risks of adverse developments in such areas of focus than a strategy that is more broadly diversified across a wider variety of investments.

Interest Rate Risk: Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true: bond prices generally rise when interest rates fall. In general, fixed income securities with longer maturities are more sensitive to these price changes. Most other investments are also sensitive to the level and direction of interest rates.

Legal or Legislative Risk: Legislative changes or Court rulings may impact the value of investments, or the securities' claim on the issuer's assets and finances.

Inflation: Inflation may erode the buying power of your investment portfolio, even if the dollar value of your investments remains the same.

RISKS ASSOCIATED WITH SECURITIES

Apart from the general risks outlined above which apply to all types of investments, specific securities may have other risks.

Commercial Paper is, in most cases, an unsecured promissory note that is issued with a maturity of 270 days or less. Being unsecured the risk to the investor is that the issuer may default.

Common stocks may go up and down in price quite dramatically, and in the event of an issuer's bankruptcy or restructuring could lose all value. A slower-growth or recessionary economic environment could have an adverse effect on the price of all stocks.

Corporate Bonds are debt securities to borrow money. Generally, issuers pay investors periodic interest and repay the amount borrowed either periodically during the life of the security and/or at maturity. Alternatively, investors can purchase other debt securities, such as zero-coupon bonds, which do not pay current interest, but rather are priced at a discount from their face values and their values accrete over time to face value at maturity.

The market prices of debt securities fluctuate depending on factors such as interest rates, credit quality, and maturity. In general, market prices of debt securities decline when interest rates rise and increase when interest rates fall. The longer the time to a bond's maturity, the greater its interest rate risk.

Bank Obligations including bonds and certificates of deposit may be vulnerable to setbacks or panics in the banking industry.

Banks and other financial institutions are greatly affected by interest rates and may be adversely affected by downturns in the U.S. and foreign economies or changes in banking regulations.

Municipal Bonds are debt obligations generally issued to obtain funds for various public purposes, including the construction of public facilities. Municipal bonds pay a lower rate of return than most other types of bonds. However, because of a municipal bond's tax-favored status, investors should compare the relative after-tax return to the after-tax return of other bonds, depending on the investor's tax bracket.

Investing in municipal bonds carries the same general risks as investing in bonds in general. Those risks include interest rate risk, reinvestment risk, inflation risk, market risk, call or redemption risk, credit risk, and liquidity and valuation risk.

Options and other derivatives carry many unique risks, including time-sensitivity, and can result in the complete loss of principal. While covered call writing does provide a partial hedge to the stock against which the call is written, the hedge is limited to the amount of cash flow received when writing the option. When selling covered calls, there is a risk the underlying position may be called away at a price lower than the current market price.

Exchange Traded Funds prices may vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track underlying benchmarks as expected. ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value; (ii) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are delisted from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. The advisor has no control over the risks taken by the underlying funds in which the Clients invest.

Investment Companies Risk. When a Client invests in open-end mutual funds or ETFs, the Client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the Client will incur higher expenses, many of which may be duplicative. In addition, the Client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives).

Item 9: Disciplinary Information

Criminal or Civil Actions

ALBAFin and its management have not been involved in any criminal or civil action.

Administrative Enforcement Proceedings

ALBAFin and its management have not been involved in administrative enforcement proceedings.

Self-Regulatory Organization Enforcement Proceedings

ALBAFin and its management have not been involved in legal or disciplinary events that are material to a Client's or prospective Client's evaluation of ALBAFin or the integrity of its management.

Item 10: Other Financial Industry Activities and Affiliations

ALBAFin is an independent firm, without material industry affiliations other than those listed in the ADV Part 2B outside business activities. These affiliations listed are companies wholly owned by Robert Dodson but separate businesses. **ROBERT DODSON RECEIVES COMMISSION FROM INSURANCE COMPANIES FOR PRODUCTS OF LIFE AND ANNUITIES SOLD. THIS COMMISSION IS NOT PAID BY OR THROUGH ALBA FINANCIAL LLC BUT FROM AN INDEPENDENT INSURANCE AGENCY 'DAL RIATA INSURANCE LLC' THAT IS WHOLLY OWNED BY ROBERT DODSON.**

Neither the firm nor its employees are registered or have pending registrations as: a broker-dealer, a futures commission merchant, a commodity pool operator, or a commodity trading advisor.

ALBAFin only receives compensation directly from Clients. We do not receive compensation from any outside source. We do not have any conflicts of interest with any outside party.

Robert Dodson is licensed to sell life, health insurance, disability, long term care, and property casualty insurance however, he does not write any policies, nor receive compensation from this area through ALBA Financial LLC.

RECOMMENDATIONS OR SELECTIONS OF OTHER INVESTMENT ADVISORS

As referenced in Item 4 of this brochure, ALBAFin may recommend Clients to Outside Managers to manage their accounts. If we recommend an Outside Manager, please note that we do not share in their advisory fee. Our fee is separate and in addition to their compensation (as noted in Item 5) and will be described to you prior to engagement. You are not obligated, contractually or otherwise, to use the services of any Outside Manager we recommend. Additionally, ALBAFin will only recommend an Outside Manager who is properly licensed or registered as an investment advisor.

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

As a fiduciary, our firm and its associates have a duty of utmost good faith to act solely in the best interests of each Client. Our Clients entrust us with their funds and personal information, which in turn places a high standard on our conduct and integrity. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all of our dealings. The firm also accepts the obligation not only to comply with the mandates and requirements of all applicable laws and regulations but also to take responsibility to act in an ethical and professionally responsible manner in all professional services and activities.

CODE OF ETHICS

This code does not attempt to identify all possible conflicts of interest, and literal compliance with each of its specific provisions will not shield associated persons from liability for personal trading or other conduct that violates a fiduciary duty to advisory Clients. A summary of the Code of Ethics' Principles is outlined below:

- ★ Integrity - Associated persons shall offer and provide professional services with integrity.
- ★ Objectivity - Associated persons shall be objective in providing professional services to Clients.
- ★ Competence - Associated persons shall provide services to Clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which they are engaged.
- ★ Fairness - Associated persons shall perform professional services in a manner that is fair and reasonable to Clients, principals, partners, and employers, and shall disclose conflict(s) of interest in providing such services.
- ★ Confidentiality - Associated persons shall not disclose confidential Client information without the specific consent of the Client unless in response to proper legal process, or as required by law.
- ★ Professionalism - Associated persons' conduct in all matters shall reflect the credit of the profession.
- ★ Diligence - Associated persons shall act diligently in providing professional services.

We periodically review and amend our Code of Ethics to ensure that it remains current, and we require all firm access persons to attest to their understanding of and adherence to the Code of Ethics at least annually. Our firm will provide a copy of its Code of Ethics to any Client or prospective Client upon request.

INVESTMENT RECOMMENDATIONS INVOLVING A MATERIAL FINANCIAL INTEREST and CONFLICTS OF INTEREST

Neither our firm, its associates or any related person is authorized to recommend to a Client or effect a transaction for a Client, involving any security in which our firm or a related person has a material financial interest, such as in the capacity as an underwriter, advisor to the issuer, etc.

ADVISORY FIRM PURCHASE OF SAME SECURITIES RECOMMENDED TO CLIENTS and CONFLICT OF INTEREST

Our firm and its "related persons" may buy or sell securities similar to, or different from, those we recommend to Clients for their accounts. In an effort to reduce or eliminate certain conflicts of interest involving the firm or personal trading, our policy may require that we restrict or prohibit associates' transactions in specific reportable securities transactions. Any exceptions or trading pre-clearance must be approved by the firm principal in advance of the transaction in an account, and we maintain the required personal securities transaction records per regulation.

TRADING SECURITIES AT/AROUND THE SAME TIME AS CLIENT'S SECURITIES

From time to time, our firm or its "related persons" may buy or sell securities for themselves at or around the same time as Clients. We will not trade non-mutual fund securities on around days prior to the same security for Clients.

Item 12: Brokerage Practices

FACTORS USED TO SELECT CUSTODIANS AND/OR BROKER-DEALERS

ALBA Financial LLC does not have any affiliation with Broker-Dealers. Specific custodian recommendations are made to the Client based on their need for such services.

We recommend custodians based on the reputation and services provided by the firm.

RESEARCH AND OTHER SOFT-DOLLAR BENEFITS

We currently do not receive soft dollar benefits by nature of our relationship with our custodian.

BROKERAGE FOR CLIENT REFERRALS

We receive no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

CLIENTS DIRECTING WHICH BROKER/DEALER/CUSTODIAN TO USE

We currently only use the one custodian, Altruist, As our firm matures we will be adding custodian options for our clients and they will be free to choose the custodian of their choice.

Altruist
For clients who choose to have an account with Altruist Financial LLC which is an SEC registered broker-dealer, FINRA member and member of SIPC that provides an online trading platform. Their securities transactions will generally be executed via Altruist Financial LLC, an unaffiliated SEC-registered broker dealer and FINRA/SIPC member. Participating Clients will receive no commissions or transaction fees, fully digital account opening, a large variety of security options, and complete integration with software tools.

AGGREGATING (BLOCK) TRADING FOR MULTIPLE CLIENT ACCOUNTS

Outside Managers used by ALBAFin may block Client trades at their discretion. Their specific practices are further discussed in their ADV Part 2A.

Item 13: Review of Accounts

Client accounts with the Investment Advisory Service will be reviewed regularly on a quarterly basis by Robert Dodson, Founder and CCO. The account is reviewed with regards to the Client's investment policies and risk tolerance levels. Events that may trigger a special review would be unusual performance, addition or deletions of Client imposed restrictions, excessive draw-down, volatility in performance, or buy and sell decisions from the firm or per Client's needs.

The Client will be invited to meet at least annually to go over the advisor's review of their portfolio and any recommendations.

Clients will receive trade confirmations from the broker(s) for each transaction in their accounts as well as monthly or quarterly statements and annual tax reporting statements from their custodian showing all activity in the accounts, such as receipt of dividends and interest.

Item 14: Client Referrals and Other Compensation

Other than described below, we do not receive any economic benefit, directly or indirectly, from any third party for advice rendered to our Clients. Nor do we, directly or indirectly, compensate any person who is not advisory personnel for Client referrals.

ALBAFin considers a number of factors before recommending a particular broker-dealer to our clients, including but not limited to, their familiarity with the securities to be sold or purchased, their execution skills, order-flow capabilities, access to markets, overall knowledge of the market, responsiveness, their commission rates or other fee schedules, their custodial services, reputation within the industry, their level of net capital (financial strength) and excess SIPC and other insurance coverage.

Specific disclosure for Altruist

ALBAFin currently does not have any soft dollar benefits or research tools provided to ALBAFin by Altruist. As Altruist is a newer platform than those more established, they may provide benefits in future, and we will update when this occurs. There may be economic benefits such as no fees and trade costs but otherwise, none.

Item 15: Custody

ALBAFin does not accept custody of Client funds except in the instance of withdrawing Client fees. Clients should receive at least quarterly statements from the broker-dealer, bank or other qualified custodian that holds and maintains Client's investment assets. We urge you to carefully review such statements and compare such official custodial records to the account statements or reports that we may provide to you.

Our statements or reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

For Client accounts in which ALBAFin instructs the custodian to debits the advisory fee:

I. ALBAFin will send a copy of its invoice to the custodian while it sends the Client a copy.
II. The custodian will send at least quarterly statements to the Client showing all disbursements for the account, including the amount of the advisory fee.
III. The Client will provide written authorization to ALBAFin permitting them to be paid directly for their accounts held by the custodian.

Item 16: Investment Discretion

ALBAFin offers Investment Management services on both a discretionary, and non-discretionary basis.

For those client accounts where we provide investment management services, on a non-discretionary basis, we do not exercise discretion over client accounts with respect to securities to be bought and sold and the amount of securities to be bought and sold. The client must authorize all purchase and sell transactions prior to execution. This service is clearly notated on the investment advisory agreement.

For those client accounts where ALBAFin provides investment management services on a discretionary basis, we maintain discretion over client accounts with respect to securities to be bought and sold and the amount of securities to be bought and sold. Investment discretion is explained to clients in detail when an advisory relationship has commenced. At the start of the advisory relationship, the client will execute a Limited Power of Attorney which will grant our firm discretion over the account.

Additionally, the discretionary relationship will be outlined in the advisory contract and signed by the client. This service is clearly notated on the investment advisory agreement.

Item 17: Voting Client Securities

We do not vote Client proxies. Therefore, Clients maintain exclusive responsibility for:

(1) voting proxies, and
(2) acting on corporate actions pertaining to the Client's investment assets.

The Client shall instruct the Client's qualified custodian to forward to the Client copies of all proxies and shareholder communications relating to the Client's investment assets. If the Client would like our opinion on a particular proxy vote, they may contact us at the number listed on the cover of this brochure.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward you any electronic solicitation to vote proxies.

Item 18: Financial Information

Registered Investment advisors are required in this Item to provide you with certain financial information or disclosures about our financial condition. We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to Clients, and we have not been the subject of a bankruptcy proceeding.

We do not have custody of Client funds or securities or require or solicit prepayment of more than $500 in fees per Client six months in advance.

ADDITIONAL INFORMATION

Trade Errors

In the event a trading error occurs in your account, our policy is to restore your account to the position it should have been in had the trading error not occurred. Depending on the circumstances, corrective actions may include canceling the trade, adjusting an allocation, and/or reimbursing the account.

Class Action Lawsuits

We do not determine if securities held by you are the subject of a class action lawsuit or whether you are eligible to participate in class action settlements or litigation nor do we initiate or participate in litigation to recover damages on your behalf for injuries because of actions, misconduct, or negligence by issuers of securities held by you.

IRA Rollover Considerations

As part of our investment advisory services to you, we may recommend that you withdraw the assets from your employer's retirement plan and roll the assets over to an individual retirement account ("IRA") that we will manage on your behalf. If you elect to roll the assets to an IRA that is subject to our management, we may charge you an asset-based fee as set forth in the agreement you executed with our firm. This practice presents a conflict of interest because persons providing investment advice on our behalf have an incentive to recommend a rollover to you for the purpose of generating fee-based compensation rather than solely based on your needs. You are under no obligation, contractually or otherwise, to complete the rollover. Moreover, if you do complete the rollover, you are under no obligation to have the assets in an IRA managed by our firm. Many employers permit former employees to keep their retirement assets in their company plan. Current employees can sometimes move assets out of their company plan before they retire or change jobs. In determining whether to complete the rollover to an IRA, and to the extent the following options are available, you should consider the costs and benefits of:

1. Leaving the funds in your employer's (former employer's) plan.
2. Moving the funds to a new employer's retirement plan.
3. Cashing out and taking a taxable distribution from the plan.
4. Rolling the funds into an IRA rollover account.

Each of these options has advantages and disadvantages and before making a change we encourage you to speak with your CPA and/or tax attorney.

Item 19: Requirements for State-Registered advisors

ROBERT ALEXANDER DONALD DODSON > Born: 1989

Educational Background

- 2012 - American Studies and History - BA Hons, University of Wales, Swansea, United Kingdom
- 2013 - History - MA, Northumbria University at Newcastle, United Kingdom

Business Experience

- 06/2023 – Present, ALBA Financial LLC, Founder and CCO
- 06/2020 – Present, Farm Bureau Financial Services, Insurance Agent and Financial Advisor
- 09/2019 - 06/2020, Heritage Financial Services, Financial Advisor
- 12/2016 – 09/2020, Edward Jones, Financial Advisor
- 10/2015 – 11/2016, Foresters Financial, Registered Rep

Designations, Licensing & Exams

Series 7, 6, 63, and 66.

Other Business Activities

Robert Dodson is currently 100% owner of Britannia Consulting LLC - A business growth and sales consulting firm.
Robert Dodson is currently 100% owner of Dal Riata Insurance LLC - An Independent Insurance Agency.

Performance-Based Fees

ALBAFin is not compensated by performance-based fees.

Material Disciplinary Disclosures

No management person at ALBA Financial LLC has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Material Relationships That Management Persons Have With Issuers of Securities

ALBA Financial LLC nor Robert AD Dodson, have any relationship or arrangement with issuers of securities, in addition to what is described in Item 10.

Additional Compensation

Robert AD Dodson does not receive any economic benefit from any person, company, or organization, in exchange for providing Clients advisory services through ALBAFin.

Supervision

Robert AD Dodson, as Founder and Chief Compliance Officer of ALBAFin is responsible for supervision. He may be contacted at the phone number on this brochure supplement.

Requirements for State Registered advisors

Robert AD Dodson has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.

ALBA Financial LLC

736 Forest Dr, Council Bluffs, IA 51503
(402) 305-6732
www.albafinancialgroup.com

Form ADV Part 2B - Brochure Supplement

Dated: June 12th, 2023

For

Robert Alexander Donald Dodson
CRD# **6594056**
Founder and Chief Compliance Officer

This brochure supplement provides information about Robert AD Dodson that supplements the ALBA Financial LLC, ("ALBAFin") brochure. A copy of that brochure precedes this supplement. Please contact Robert AD Dodson if the ALBAFin brochure is not included with this supplement or if you have any questions about the contents of this supplement. Additional information about Robert AD Dodson is available on the SEC's website at www.advisorinfo.sec.gov which can be found using the identification number 6594056.

Item 1: Educational Background and Business Experience

ROBERT ALEXANDER DONALD DODSON > Born: 1989

Educational Background

- 2012 - American Studies and History - BA Hons, University of Wales, Swansea, United Kingdom
- 2013 - History - MA, Northumbria University at Newcastle, United Kingdom

Business Experience

- 06/2023 – Present, ALBA Financial LLC, Founder and CCO
- 06/2020 – Present, Farm Bureau Financial Services, Insurance Agent and Financial Advisor
- 09/2019 - 06/2020, Heritage Financial Services, Financial Advisor
- 12/2016 – 09/2020, Edward Jones, Financial Advisor
- 10/2015 – 11/2016, Foresters Financial, Registered Rep

Designations, Licensing & Exams

Series 7, 6, 63, and 66.

Item 2: Disciplinary Information

No management person at ALBA Financial LLC has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Item 3: Other Business Activities

Robert Dodson is currently 100% owner of Britannia Consulting LLC - A business growth and sales consulting firm.
Robert Dodson is currently 100% owner of Dal Riata Insurance LLC - An Independent Insurance Agency.

Item 4: Additional Compensation

Robert AD Dodson does not receive any economic benefit from any person, company, or organization, in exchange for providing Clients advisory services through ALBAFin.

Item 5: Supervision

Robert AD Dodson, as Founder and Chief Compliance Officer of ALBAFin is responsible for supervision. He may be contacted at the phone number on this brochure supplement.

Item 6: Requirements for State Registered advisors

Robert AD Dodson has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.

ALBA Financial LLC
736 Forest Dr, Council Bluffs, IA 51503
(402) 305-6732
www.albafinancialgroup.com

Form ADV Part 2A - Appendix 1 - Wrap Fee Program Brochure

Dated: June 12th, 2023

This Wrap Fee Program Brochure provides information about the qualifications and business practices of ALBA Financial LLC. If you have any questions about the contents of this Brochure, please contact us at (402) 305-6732.

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.

ALBA Financial LLC registered as an Investment Advisor with the State of Iowa. Registration of an Investment Advisor does not imply any level of skill or training.

You are encouraged to review both this Brochure and the Brochure Supplements any of our firm's associates who advise you for more information on the qualifications of our firm and our employees.

Additional information about ALBA Financial LLC is available on the SEC's website at www.advisorinfo.sec.gov CRD: 327309

Item 2: Material Changes

As this is the initial filing there will b eno material changes. Any future changes to this brochure will be updated at least annually or an as needed basis.

Item 3: Table of Contents

Item 4: Services, Fees and Compensation

DESCRIPTION OF OUR SERVICES

We offer wrap fee programs as described in this Wrap Fee Program Brochure. Our wrap fee accounts are managed on an individualized basis according to the client's investment objectives, financial goals, risk tolerance, etc.

TYPES OF ADVISORY SERVICES

We are in the business of managing individually tailored investment portfolios. Our firm provides continuous advice to a client regarding the investment of client funds based on the individual needs of the client. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, we develop a client's personal investment policy or an investment plan with an asset allocation target and create and manage a portfolio based on that policy and allocation targets.

Fees pertaining to this service are outlined in Item 5 of this brochure.

Use of Third Party Managers, Outside Managers, or Sub-Advisors (TAMPs)
We may offer the use of Third Party Managers, Outside Managers, or Sub-Advisors (TAMPs) for portfolio management services. We assist clients in selecting an appropriate allocation model, completing the Outside Manager's investor profile questionnaire, interacting with the Outside Manager and reviewing the Outside Manager. Our review process and analysis of outside managers is further discussed in Item 8 of this Form ADV Part 2A. Additionally, we will meet with the client on a periodic basis to discuss changes in their personal or financial situation, suitability, and any new or revised restrictions to be applied to the account.

Fees pertaining to this service are outlined in Item 5 of this brochure.

- Primary investment management offering We offer to client's management of their investments in-house as the typical standard option. This includes analyzing assessment answers regarding risk, capacity for loss, ethical considerations and other goal/risk factors before creating a portfolio.
- Use of Third-Party Managers, Outside Managers, or Sub-Advisors (TAMPs) We can offer the use of Third Party Managers, Outside Managers, or Sub-Advisors (TAMPs) for portfolio management services. We can assist Clients in selecting an appropriate allocation model, completing the Outside Manager's investor profile questionnaire, interacting with the Outside Manager and reviewing the Outside Manager. Our review process and analysis of outside managers is further discussed in Item 8 of this Form ADV Part 2A. Additionally, we will meet with the Client on a periodic basis to discuss changes in their personal or financial situation, suitability, and any new or revised restrictions to be applied to the account. Fees pertaining to this service are outlined in Item 5 of this brochure.

INVESTMENT ADVISORY WRAP FEE PROGRAM FEE SCHEDULE

Our standard wrap-fee program fee schedule is based upon the market value of the assets under management and is calculated as follows:

ACCOUNT VALUE $	ADVISORY FEE %
$0.00-$299,999	1.60%
$300,000-$499,999	1.35%
$500,000-$749,999	1.25%
$750,000-$999,999	1.10%
$1,000,000+	1.00%

The annual fees are negotiable and are pro-rated and paid in arrears on a monthly basis, as agreed with the client, and based on the value of portfolio assets of the account managed by the ALBAFin as of the last day of business of the month or quarter.

New account fees will be prorated from the inception of the account to the end of the month or quarter.

Altruist accounts: Advisory fees are directly debited from client accounts. Accounts initiated or terminated during a calendar month will be charged a prorated fee based on the amount of time remaining in the billing period. An account may be terminated with written notice at least 15 calendar days in advance. Since fees are paid in arrears, no rebate will be needed upon termination of the account.

Please note: the fees described above are inclusive of transaction fees or any other fees assessed by the broker-dealer or custodian.

Altruist accounts: Advisory fees are directly debited from client accounts. Accounts initiated or terminated during a calendar month will be charged a prorated fee based on the amount of time remaining in the billing period. An account may be terminated with written notice at least 15 calendar days in advance. Since fees are paid in arrears, no rebate will be needed upon termination of the account.

ADDITIONAL BUNDLED SERVICE COST CONSIDERATIONS

A wrap fee program allows our clients to pay a specified fee for investment advisory services and the execution of transactions. The advisory services may include portfolio management and the fee is not based directly upon transactions in the client's account. The client's fee is bundled with our costs for executing transactions in his or her account(s). This may result in a higher advisory fee. We do not charge our clients higher advisory fees based on their trading activity, but you should be aware that we may have an incentive to limit our trading activities in your account(s) because we are charged for executed trades.

By participating in a wrap fee program, you may end up paying more or less than you would through a non-wrap fee program where a lower advisory fee is charged, but trade execution costs are passed directly through to you by the executing broker.

ADDITIONAL EXPENSES THAT ARE NOT INCLUDED IN THE WRAP PROGRAM FEE

You may pay custodial fees (charges imposed directly by a mutual fund, index fund, or exchange-traded fund) which shall be disclosed in the fund's prospectus (e.g., fund management fees and other fund expenses), mark-ups and mark-downs, spreads paid to market makers, wire transfer fees, and other fees and taxes on brokerage accounts and securities transactions.

These fees are not included within the wrap fee you are charged by our firm.

We may invest clients in No Transaction Fee (NTF) funds when available. The NTF funds do not pay the custodian a ticket charge, unlike a regular fund; however, it does incur a higher expense ratio than normal funds. Because we offer our advisory services under a wrap program where we pay all ticket charges incurred, we have a financial interest to minimize these charges.

COMPENSATION

Our investment advisory representatives receive a portion of the advisory fee that you pay us, either directly as a percentage of your overall fee or as their salary from our firm. In cases where our investment advisory representatives are paid a percentage of your overall advisory fee, this may create an incentive to recommend that you participate in a wrap fee program rather than a non-wrap fee program (where you would pay for trade execution costs) or brokerage account where commissions are charged. This is because, in some cases, we may stand to earn more compensation from advisory fees paid to us through a wrap fee program arrangement if your account is not actively traded.

Item 5: Account Requirements and Types of Clients

We provide financial planning and portfolio management services to:

- individuals,
- high net-worth individuals,
- charitable organizations,
- corporations,
- or other businesses.

We do not have a minimum account size requirement.

Item 6: Portfolio Manager Selection and Evaluation Outside Portfolio Managers

We may refer Clients to third-party investment advisors ("outside managers"). Our analysis of outside managers involves the examination of the experience, expertise, investment philosophies, and past performance of the outside managers in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We monitor the manager's underlying holdings, strategies, concentrations, and leverage as part of our overall periodic risk assessment. Additionally, as part of our due diligence process, we survey the manager's compliance and business enterprise risks.

A risk of investing with an outside manager who has been successful in the past is that he or she may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in an outside manager's portfolio. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for our Clients. Moreover, as we do not control the manager's daily business and compliance operations, we may be unaware of the lack of internal controls necessary to prevent business, regulatory or reputational deficiencies. If we do not refer to third-party investment advisors, then ALBA Financial LLC acts as the portfolio manager.

ALBA Financial LLC Portfolio Managers Our firm and its related person, Robert AD Dodson, may act as a portfolio manager for the wrap fee program previously described in this Wrap Fee Program Brochure, unless otherwise stated. This may create a conflict of interest in that other investment advisory firms may charge the same or lower fees than our firm for similar services. Our related person portfolio managers are not subject to the same selection and review as outside portfolio managers that participate in the wrap fee program. Advisory Business See Item 4 of this Wrap Fee Program Brochure for information about our wrap fee advisory programs.

INDIVIDUAL TAILORING OF ADVICE TO CLIENTS

We offer individualized investment advice to clients utilizing our Asset Management and Comprehensive Portfolio Management services. The Ability of Clients to Impose Restrictions on Investing in Certain Securities or Types of Securities We do allow clients to impose reasonable restrictions on investing in certain securities or types of securities. Participation in Wrap Fee Programs Our wrap fee and non-wrap fee accounts are managed on an individualized basis according to the client's investment objectives, financial goals, risk tolerance, etc. We do not manage wrap fee accounts in a different fashion than non-wrap fee accounts.

PERFORMANCE BASED FEES and SIDE BY SIDE MANAGEMENT

We do not charge performance-based fees and do not engage in side-by-side management.

METHODS OF ANALYSIS, INVESTMENT STRATEGIES, and RISK OF LOSS

When we complete an Investment Analysis as part of a financial plan, our approach involves analyzing investment portfolios from the standpoints of diversification, asset allocation and modern portfolio theory, risk factors.

DIVERSIFICATION

Diversification involves investing in companies from many industries, countries, and geographical regions with the goal of reducing or offsetting the risks that each of these factors pose in a portfolio individually. Diversified portfolios are less susceptible to single company, sector, and geographic risks but remain exposed to the systematic risk of the broad market.

SOCIALLY RESPONSIBLE INVESTING: ENVIRONMENTAL, SOCIAL, AND GOVERNANCE

Our Environmental, Social, and Governance (ESG) strategies seek to invest in the securities of companies (or funds containing such securities) that demonstrate one or more positive characteristics concerning environmental, social, and corporate governance ("ESG"). This approach resonates with many who seek to align investment decisions with core values. It is also the Firm's judgment that such strategies will become increasingly effective for generating investment returns as concerns around climate change, equality, and culture become essential to the forward-looking strategies of publicly traded companies. Our approach is to follow the client's requirements following a thorough assessment via a variety of software methods to assess their morals and ethics. We screen individual companies for our single stock portfolios and ETFs and mutual funds to remove or purposefully advocate for the clients goals.

ASSET ALLOCATION AND MODERN PORTFOLIO THEORY (MPT)

Asset Allocation refers to the composition of different kinds of assets such as cash, stocks, and bonds within a portfolio and to the subdivisions within those asset classes such as U.S. or foreign and small or large companies. According to Modern Portfolio Theory, a concept first developed in the 1950s and refined in the years since, different asset classes have different expectations for risk and return, and those expectations can be used to construct a portfolio with the highest expected return for a given level of risk. Modern Portfolio Theory assumes a diversified portfolio, consistent allocation percentages for each asset class, and a long enough time horizon to average out the significant expected variation in investment returns from year to year.

The underlying principles of MPT are:

- ❖ Investors are risk averse. The only acceptable risk is that which is adequately compensated by an expected return. Risk and investment return are related and an increase in risk requires an increased expected return.
- ❖ Markets are efficient. The same market information is available to all investors at the same time. The market prices every security fairly based upon this equal availability of information.
- ❖ The design of the portfolio is more important than the selection of any particular security. The appropriate allocation of capital among asset classes will have far more influence on long-term portfolio performance than the selection of individual securities.
- ❖ Investing for the long-term (preferably longer than ten years) becomes critical to investment success because it allows the long-term characteristics of the asset classes to surface.
- ❖ Increasing diversification of the portfolio with lower correlated asset class positions can decrease portfolio risk. Correlation is the statistical term for the extent to which two asset classes move in tandem or opposition to one another.

OTHER RISK FACTORS

Risk Factors are measures of the volatility of different types of assets based on their past returns. Academic research has shown that the total risk of an asset or portfolio can be broken down into its exposures to each underlying risk factor. This can be useful for determining a portfolio's exposure to different types of risks, and for evaluating whether a portfolio or fund manager has added or subtracted value beyond what can be explained by total risk exposure. Risk factors are based on past performance and assume a consistent portfolio management style, so they may have limitations for predicting future risk and returns.

USE OF OUTSIDE MANAGERS

We may refer Clients to third-party investment advisors ("outside managers"). Our analysis of outside managers involves the examination of the experience, expertise, investment philosophies, and past performance of the outside managers in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We monitor the manager's underlying holdings, strategies, concentrations, and leverage as part of our overall periodic risk assessment. Additionally, as part of our due diligence process, we survey the manager's compliance and business enterprise risks. A risk of investing with an outside manager who has been successful in the past is that he or she may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in an outside manager's portfolio. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for our Clients. Moreover, as we do not control the manager's daily business and compliance operations, we may be unaware of the lack of internal controls necessary to prevent business, regulatory or reputational deficiencies.

MATERIAL RISKS INVOLVED

All investing strategies we offer involve risk and may result in a loss of your original investment which you should be prepared to bear. Many of these risks apply equally to stocks, bonds, commodities, and any other investment or security. Material risks associated with our investment strategies are listed below:

Market Risk: Market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the value of the investment regardless of the operational success of the issuer's operations or its financial condition.

Strategy Risk: The advisor's investment strategies and/or investment techniques may not work as intended.

Small and Medium Cap Company Risk: Securities of companies with small and medium market capitalizations are often more volatile and less liquid than investments in larger companies. Small and medium cap companies may face a greater risk of business failure, which could increase the volatility of the Client's portfolio.

Turnover Risk: At times, the strategy may have a portfolio turnover rate that is higher than other strategies. A high portfolio turnover would result in correspondingly greater brokerage commission expenses and may result in the distribution of additional capital gains for tax purposes. These factors may negatively affect the account's performance.

Limited markets: Certain securities may be less liquid (harder to sell or buy) and their prices may at times be more volatile than at other times. Under certain market conditions, we may be unable to sell or liquidate investments at prices we consider reasonable or favorable or find buyers at any price.

Concentration Risk: Certain investment strategies focus on particular asset-classes, industries, sectors or types of investment. From time to time these strategies may be subject to greater risks of adverse developments in such areas of focus than a strategy that is more broadly diversified across a wider variety of investments.

Interest Rate Risk: Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true: bond prices generally rise when interest rates fall. In general, fixed income securities with longer maturities are more sensitive to these price changes. Most other investments are also sensitive to the level and direction of interest rates.

Legal or Legislative Risk: Legislative changes or Court rulings may impact the value of investments, or the securities' claim on the issuer's assets and finances.

Inflation: Inflation may erode the buying power of your investment portfolio, even if the dollar value of your investments remains the same.

RISKS ASSOCIATED WITH SECURITIES

Apart from the general risks outlined above which apply to all types of investments, specific securities may have other risks.

Commercial Paper is, in most cases, an unsecured promissory note that is issued with a maturity of 270 days or less. Being unsecured the risk to the investor is that the issuer may default.

Common stocks may go up and down in price quite dramatically, and in the event of an issuer's bankruptcy or restructuring could lose all value. A slower-growth or recessionary economic environment could have an adverse effect on the price of all stocks.

Corporate Bonds are debt securities to borrow money. Generally, issuers pay investors periodic interest and repay the amount borrowed either periodically during the life of the security and/or at maturity. Alternatively, investors can purchase other debt securities, such as zero-coupon bonds, which do not pay current interest, but rather are priced at a discount from their face values and their values accrete over time to face value at maturity.

The market prices of debt securities fluctuate depending on factors such as interest rates, credit quality, and maturity. In general, market prices of debt securities decline when interest rates rise and increase when interest rates fall. The longer the time to a bond's maturity, the greater its interest rate risk.

Bank Obligations including bonds and certificates of deposit may be vulnerable to setbacks or panics in the banking industry.

Banks and other financial institutions are greatly affected by interest rates and may be adversely affected by downturns in the U.S. and foreign economies or changes in banking regulations.

Municipal Bonds are debt obligations generally issued to obtain funds for various public purposes, including the construction of public facilities. Municipal bonds pay a lower rate of return than most other types of bonds. However, because of a municipal bond's tax-favored status, investors should compare the relative after-tax return to the after-tax return of other bonds, depending on the investor's tax bracket.

Investing in municipal bonds carries the same general risks as investing in bonds in general. Those risks include interest rate risk, reinvestment risk, inflation risk, market risk, call or redemption risk, credit risk, and liquidity and valuation risk.

Options and other derivatives carry many unique risks, including time-sensitivity, and can result in the complete loss of principal. While covered call writing does provide a partial hedge to the stock against which the call is written, the hedge is limited to the amount of cash flow received when writing the option. When selling covered calls, there is a risk the underlying position may be called away at a price lower than the current market price.

Exchange Traded Funds prices may vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track underlying benchmarks as expected. ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value; (ii) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are delisted from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. The advisor has no control over the risks taken by the underlying funds in which the Clients invest.

Investment Companies Risk. When a Client invests in open-end mutual funds or ETFs, the Client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the Client will incur higher expenses, many of which may be duplicative. In addition, the Client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives).

Item 7: Client Information Provided to Portfolio Manager

We are required to describe the information about you that we communicate to your portfolio manager(s) and how often or under what circumstances we provide updated information. Our firm communicates with your portfolio manager(s) on a regular basis as needed (daily, weekly, monthly, etc.) to ensure your most current investment goals and objectives are understood by your portfolio manager(s). In most cases, we will communicate such information as part of our regular investment management duties. Nevertheless, we will also communicate information to your portfolio manager(s) when you ask us to, when market or economic conditions make it prudent to do so, etc.

Item 8: Client Contact with Portfolio Manager

Our clients may directly contact their portfolio manager(s) with questions or concerns by calling the number on this Brochure.

Item 9: Additional Information Disciplinary Information

We have determined that our firm and management have no disciplinary information to disclose.

Other Financial Industry Activities and Affiliations

Robert Dodson is licensed to sell life, health insurance, disability, long term care, and property casualty insurance however, he does not write any policies, nor receive compensation from this area through ALBA Financial LLC.

ALBA Financial LLC only receives compensation directly from Clients. We do not receive compensation from any outside source. We do not have any conflicts of interest with any outside party other than those companies outlined in Form ADV Part 2B - Outside Business Activities..

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

As a fiduciary, our firm and its associates have a duty of utmost good faith to act solely in the best interests of each Client. Our Clients entrust us with their funds and personal information, which in turn places a high standard on our conduct and integrity. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all of our dealings. The firm also accepts the obligation not only to comply with the mandates and requirements of all applicable laws and regulations but also to take responsibility to act in an ethical and professionally responsible manner in all professional services and activities.

CODE OF ETHICS

This code does not attempt to identify all possible conflicts of interest, and literal compliance with each of its specific provisions will not shield associated persons from liability for personal trading or other conduct that violates a fiduciary duty to advisory Clients. A summary of the Code of Ethics' Principles is outlined below:

- Integrity - Associated persons shall offer and provide professional services with integrity.
- Objectivity - Associated persons shall be objective in providing professional services to Clients.
- Competence - Associated persons shall provide services to Clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which they are engaged.
- Fairness - Associated persons shall perform professional services in a manner that is fair and reasonable to Clients, principals, partners, and employers, and shall disclose conflict(s) of interest in providing such services.
- Confidentiality - Associated persons shall not disclose confidential Client information without the specific consent of the Client unless in response to proper legal process, or as required by law.
- Professionalism - Associated persons' conduct in all matters shall reflect the credit of the profession.
- Diligence - Associated persons shall act diligently in providing professional services.

We periodically review and amend our Code of Ethics to ensure that it remains current, and we require all firm access persons to attest to their understanding of and adherence to the Code of Ethics at least annually. Our firm will provide a copy of its Code of Ethics to any Client or prospective Client upon request.

INVESTMENT RECOMMENDATIONS INVOLVING A MATERIAL FINANCIAL INTEREST and CONFLICTS OF INTEREST

Neither our firm, its associates or any related person is authorized to recommend to a Client or effect a transaction for a Client, involving any security in which our firm or a related person has a material financial interest, such as in the capacity as an underwriter, advisor to the issuer, etc.

ADVISORY FIRM PURCHASE OF SAME SECURITIES RECOMMENDED TO CLIENTS and CONFLICT OF INTEREST

Our firm and its "related persons" may buy or sell securities similar to, or different from, those we recommend to Clients for their accounts. In an effort to reduce or eliminate certain conflicts of interest involving the firm or personal trading, our policy may require that we restrict or prohibit associates' transactions in specific reportable securities transactions. Any exceptions or trading pre-clearance must be approved by the firm principal in advance of the transaction in an account, and we maintain the required personal securities transaction records per regulation.

TRADING SECURITIES AT/AROUND THE SAME TIME AS CLIENT'S SECURITIES

From time to time, our firm or its "related persons" may buy or sell securities for themselves at or around the same time as Clients. We will not trade non-mutual fund securities on around days prior to the same security for Clients.

The Custodian we use is Altruist. We will recommend that you use Altruist; member FINRA/SIPC/NFA for brokerage and custodial services.

Specific disclosure for Altruist
ALBAFin currently does not have any soft dollar benefits or research tools provided to ALBAFIn by Altruist. As Altruist is a newer platform than those more established, they may provide benefits in future, and we will update when this occurs. There may be economic benefits such as no fees and trade costs but otherwise, none.

FINANCIAL INFORMATION

Registered investment advisors are required in this Item to provide you with certain financial information or disclosures about our financial condition. We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to clients, and we have not been the subject of a bankruptcy proceeding.

Item 10 Requirements for State-Registered Advisors

Material Relationships That Management Persons Have With Issuers of Securities ALBA Financial LLC, nor any management person including Robert AD Dodson, have any relationship or arrangement with issuers of securities.