

**FORM ADV****Uniform Application for Investment Adviser Registration****Part II - Page 1****OMB APPROVAL**

OMB Number: 3235-0049  
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Hours per response... 4.07

Name of Investment Adviser:

**Clarus Financial, LLC**

Address: (Number and Street)

**8150 Corporate Park Drive, Suite 205**

(City)

**Cincinnati**

(State)

**OH**

(Zip Code)

**45242**

Area Code: Telephone Number:

**( 513 ) 469-2050**

**This part of Form ADV gives information about the investment adviser and its business for the use of clients.  
The information has not been approved or verified by any governmental authority.**

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(Schedules A, B, C, D, and E are included with Part I of this Form, for the use of regulatory bodies, and are not distributed to clients.)

**Potential persons who are to respond to the collection of information contained in this form  
are not required to respond unless the form displays a currently valid OMB control number.**

**FORM ADV****Part II - Page 2**

Applicant:

**Clarus Financial, LLC**

SEC File Number:

**801-67739**

Date:

**09/30/2009****1. A. Advisory Services and Fees.** (check the applicable boxes)For each type of service provided, state the approximate % of total advisory billings from that service.  
(See instruction below.)**Applicant:**

- |                                     |     |   |            |
|-------------------------------------|-----|---|------------|
| <input checked="" type="checkbox"/> | (1) | Provides investment supervisory services . . . . .  | <u>80%</u> |
| <input checked="" type="checkbox"/> | (2) | Manages investment advisory accounts not involving investment supervisory services . . . . .  | <u>17%</u> |
| <input checked="" type="checkbox"/> | (3) | Furnishes investment advice through consultations not included in either service described above . . . . .  | <u>1%</u>  |
| <input type="checkbox"/>            | (4) | Issues periodicals about securities by subscription . . . . .   | <u>%</u>   |
| <input type="checkbox"/>            | (5) | Issues special reports about securities not included in any service described above . . . . .   | <u>%</u>   |
| <input type="checkbox"/>            | (6) | Issues, not as part of any service described above, any charts, graphs, formulas, or other devices which clients may use to evaluate securities . . . . . | <u>%</u>   |
| <input type="checkbox"/>            | (7) | On more than an occasional basis, furnishes advice to clients on matters not involving securities . . . . .   | <u>1%</u>  |
| <input type="checkbox"/>            | (8) | Provides a timing service . . . . .   | <u>%</u>   |
| <input type="checkbox"/>            | (9) | Furnishes advice about securities in any manner not described above . . . . .   | <u>1%</u>  |

(Percentages should be based on applicant's last fiscal year. If applicant has not completed its first fiscal year, provide estimates of advisory billings for that year and state that the percentages are estimates.)

**B.** Does applicant call any of the services it checked above financial planning or some similar term? . . . . .Yes ☒ No ☐**C.** Applicant offers investment advisory services for: (check all that apply)

- |  |  |
|--|--|
| <input checked="" type="checkbox"/> (1) A percentage of assets under management      | <input type="checkbox"/> (4) Subscription fees |
| <input checked="" type="checkbox"/> (2) Hourly charges                               | <input type="checkbox"/> (5) Commissions       |
| <input checked="" type="checkbox"/> (3) Fixed fees (not including subscription fees) | <input type="checkbox"/> (6) Other             |

**D.** For each checked box in A above, describe on Schedule F:

- the services provided, including the name of any publication or report issued by the adviser on a subscription basis or for a fee
- applicant's basic fee schedule, how fees are charged and whether its fees are negotiable
- when compensation is payable, and if compensation is payable before service is provided, how a client may get a refund or may terminate an investment advisory contract before its expiration date

**2. Types of clients** - Applicant generally provides investment advice to: (check those that apply)

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> A. Individuals                      | <input checked="" type="checkbox"/> E. Trusts, estates, or charitable organizations         |
| <input type="checkbox"/> B. Banks or thrift institutions                | <input type="checkbox"/> F. Corporations or business entities other than those listed above |
| <input type="checkbox"/> C. Investment companies                        | <input type="checkbox"/> G. Other (describe on Schedule F)                                  |
| <input checked="" type="checkbox"/> D. Pension and profit sharing plans |   |

**Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).**

**FORM ADV****Part II - Page 3**

Applicant:

**Clarus Financial, LLC**

SEC File Number:

801- **67739**

Date:

**09/30/2009****3. Types of Investments.** Applicant offers advice on the following: (check those that apply)

- |   |  |
|---|--|
| <input checked="" type="checkbox"/> A. Equity securities  | <input checked="" type="checkbox"/> H. United States government securities |
| <input checked="" type="checkbox"/> (1) exchange-listed securities                                |  |
| <input checked="" type="checkbox"/> (2) securities traded over-the-counter                        | I. Options contracts on:   |
| <input checked="" type="checkbox"/> (3) foreign issues  | <input type="checkbox"/> (1) securities                                    |
|   | <input type="checkbox"/> (2) commodities                                   |
| <input checked="" type="checkbox"/> B. Warrants   | J. Futures contracts on:   |
|   | <input type="checkbox"/> (1) tangibles                                     |
| <input checked="" type="checkbox"/> C. Corporate debt securities<br>(other than commercial paper) | <input type="checkbox"/> (2) intangibles                                   |
| <input type="checkbox"/> D. Commercial paper  | K. Interests in partnerships investing in:                                 |
| <input checked="" type="checkbox"/> E. Certificates of deposit                                    | <input checked="" type="checkbox"/> (1) real estate                        |
| <input checked="" type="checkbox"/> F. Municipal securities                                       | <input type="checkbox"/> (2) oil and gas interests                         |
|   | <input type="checkbox"/> (3) other (explain on Schedule F)                 |
| G. Investment company securities:   | <input type="checkbox"/> L. Other (explain on Schedule F)                  |
| <input checked="" type="checkbox"/> (1) variable life insurance                                   |  |
| <input checked="" type="checkbox"/> (2) variable annuities  |  |
| <input checked="" type="checkbox"/> (3) mutual fund shares  |  |

**4. Methods of Analysis, Sources of Information, and Investment Strategies.**

## A. Applicant's security analysis methods include: (check those that apply)

- |   |  |
|---|--|
| (1) <input type="checkbox"/> Charting               | (4) <input type="checkbox"/> Cyclical                      |
| (2) <input checked="" type="checkbox"/> Fundamental | (5) <input type="checkbox"/> Other (explain on Schedule F) |
| (3) <input checked="" type="checkbox"/> Technical   |  |

## B. The main sources of information applicant uses include: (check those that apply)

- |   |  |
|---|--|
| (1) <input checked="" type="checkbox"/> Financial newspapers and magazines    | (5) <input type="checkbox"/> Timing services   |
| (2) <input type="checkbox"/> Inspections of corporate activities              | (6) <input checked="" type="checkbox"/> Annual reports, prospectuses, filings with the<br>Securities and Exchange Commission |
| (3) <input checked="" type="checkbox"/> Research materials prepared by others | (7) <input checked="" type="checkbox"/> Company press releases   |
| (4) <input checked="" type="checkbox"/> Corporate rating services             | (8) <input type="checkbox"/> Other (explain on Schedule F)   |

## C. The investment strategies used to implement any investment advice given to clients include: (check those that apply)

- |  |  |
|--|--|
| (1) <input checked="" type="checkbox"/> Long term purchases<br>(securities held at least a year) | (5) <input type="checkbox"/> Margin transactions   |
| (2) <input checked="" type="checkbox"/> Short term purchases<br>(securities sold within a year)  | (6) <input type="checkbox"/> Option writing, including covered options, uncovered<br>options or spreading strategies |
| (3) <input type="checkbox"/> Trading (securities sold within 30 days)                            | (7) <input type="checkbox"/> Other (explain on Schedule F)   |
| (4) <input type="checkbox"/> Short sales   |  |

**Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).**

**FORM ADV****Part II - Page 4**

Applicant:

**Clarus Financial, LLC**

SEC File Number:

**801-67739**

Date:

**09/30/2009****5. Education and Business Standards.**

Are there any general standards of education or business experience that applicant requires of those involved in determining or giving investment advice to clients? . . . . .

Yes No  
☒ ☐

(If yes, describe these standards on Schedule F.)

**6. Education and Business Background.**

For:

- each member of the investment committee or group that determines general investment advice to be given to clients, or
- if the applicant has no investment committee or group, each individual who determines general investment advice given to clients (if more than five, respond only for their supervisors)
- each principal executive officer of applicant or each person with similar status or performing similar functions.

On Schedule F, give the:

- |                 |  |
|-----------------|--|
| • name          | • formal education after high school               |
| • year of birth | • business background for the preceding five years |

**7. Other Business Activities.** (check those that apply)

- ☐ A. Applicant is actively engaged in a business other than giving investment advice.
- ☐ B. Applicant sells products or services other than investment advice to clients.
- ☐ C. The principal business of applicant or its principal executive officers involves something other than providing investment advice.

(For each checked box describe the other activities, including the time spent on them, on Schedule F.)

**8. Other Financial Industry Activities or Affiliations.** (check those that apply)

- ☐ A. Applicant is registered (or has an application pending) as a securities broker-dealer.
- ☐ B. Applicant is registered (or has an application pending) as a futures commission merchant, commodity pool operator or commodity trading adviser.
- C. Applicant has arrangements that are material to its advisory business or its clients with a related person who is a:
- |  |  |
|--|--|
| <input type="checkbox"/> (1) broker-dealer   | <input type="checkbox"/> (7) accounting firm                                       |
| <input type="checkbox"/> (2) investment company  | <input type="checkbox"/> (8) law firm  |
| <input type="checkbox"/> (3) other investment adviser  | <input type="checkbox"/> (9) insurance company or agency                           |
| <input type="checkbox"/> (4) financial planning firm   | <input type="checkbox"/> (10) pension consultant                                   |
| <input type="checkbox"/> (5) commodity pool operator, commodity trading adviser or futures commission merchant | <input type="checkbox"/> (11) real estate broker or dealer                         |
| <input type="checkbox"/> (6) banking or thrift institution   | <input type="checkbox"/> (12) entity that creates or packages limited partnerships |

(For each checked box in C, on Schedule F identify the related person and describe the relationship and the arrangements.)

- D. Is applicant or a related person a general partner in any partnership in which clients are solicited to invest?.....

Yes No  
☐ ☒

(If yes, describe on Schedule F the partnerships and what they invest in.)

**Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).**

**FORM ADV**
**Part II - Page 5**

Applicant:

**Clarus Financial, LLC**

SEC File Number:

801- **67739**

Date:

**09/30/2009**
**9. Participation or Interest in Client Transactions.**

Applicant or a related person: (check those that apply)

- ☐ A. As principal, buys securities for itself from or sells securities it owns to any client.
- ☐ B. As broker or agent effects securities transactions for compensation for any client.
- ☐ C. As broker or agent for any person other than a client effects transactions in which client securities are sold to or bought from a brokerage customer.
- ☐ D. Recommends to clients that they buy or sell securities or investment products in which the applicant or a related person has some financial interest.
- ☒ E. Buys or sells for itself securities that it also recommends to clients.

(For each box checked, describe on Schedule F when the applicant or a related person engages in these transactions and what restrictions, internal procedures, or disclosures are used for conflicts of interest in those transactions.)

Describe, on Schedule F, your code of ethics, and state that you will provide a copy of your code of ethics to any client or prospective client upon request.

- 10. Conditions for Managing Accounts.** Does the applicant provide investment supervisory services, manage investment advisory accounts or hold itself out as providing financial planning or some similarly termed services *and* impose a minimum dollar value of assets or other conditions for starting or maintaining an account? . . . . .

Yes No  
☐ ☒

(If yes, describe on Schedule F.)

- 11. Review of Accounts.** If applicant provides investment supervisory services, manages investment advisory accounts, or holds itself out as providing financial planning or some similarly termed services:

- A. Describe below the reviews and reviewers of the accounts. **For reviews**, include their frequency, different levels, and triggering factors. **For reviewers**, include the number of reviewers, their titles and functions, instructions they receive from applicant on performing reviews, and number of accounts assigned each.

**Gregory T. Busch is the sole person responsible for the review of each client account. Accounts are reviewed as activities occur, formal reviews happen quarterly. Client review meetings shall be offered once a year or more often if needed. Recommendations are made reflecting changes in either risk tolerance, income or capital appreciation needs, and/or underlying investment position change due to underperformance.**

**Gregory T. Busch, IAR, 100%**

- B. Describe below the nature and frequency of regular reports to clients on their accounts.

**The Applicant furnishes portfolio performance and position holding reports to clients on a quarterly basis. Clients of the Applicant receive an original confirmation following execution of each transaction in their account. Clients also receive monthly statements from the brokerage firm acting as custodian for their account.**

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

**FORM ADV****Part II - Page 6**

Applicant:

**Clarus Financial, LLC**

SEC File Number:

**801-67739**

Date:

**09/30/2009****12. Investment or Brokerage Discretion.**

A. Does applicant or any related person have authority to determine, without obtaining specific client consent, the:

(1) securities to be bought or sold? . . . . .

Yes No

☒ ☐

(2) amount of the securities to be bought or sold ? . . . . .

Yes No

☒ ☐

(3) broker or dealer to be used ? . . . . .

Yes No

☐ ☒

(4) commission rates paid? . . . . .

Yes No

☐ ☒

B. Does applicant or a related person suggest brokers to clients? . . . . .

Yes No

☒ ☐

For each yes answer to A describe on Schedule F any limitations on the authority. For each yes to A(3), A(4) or B, describe on Schedule F the factors considered in selecting brokers and determining the reasonableness of their commissions. If the value of products, research and services given to the applicant or a related person is a factor, describe:

- the products, research and services
- whether clients may pay commissions higher than those obtainable from other brokers in return for those products and services
- whether research is used to service all of applicant's accounts or just those accounts paying for it; and
- any procedures the applicant used during the last fiscal year to direct client transactions to a particular broker in return for products and research services received.

**13. Additional Compensation.**

Does the applicant or a related person have any arrangements, oral or in writing, where it:

A. is paid cash by or receives some economic benefit (including commissions, equipment or non-research services) from a non-client in connection with giving advice to clients? . . . . .

Yes No

☒ ☐

B. directly or indirectly compensates any person for client referrals? . . . . .

Yes No

☒ ☐

(For each yes, describe the arrangements on Schedule F.)

**14. Balance Sheet.** Applicant must provide a balance sheet for the most recent fiscal year on Schedule G if applicant:

- has custody of client funds or securities unless applicant is registered or registering only with the Securities and Exchange Commission; or
- requires prepayment of more than \$500 in fees per client and 6 or more months in advance

Has applicant provided a Schedule G balance sheet? . . . . .

Yes No

☐ ☒**Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).**

**Schedule F of  
Form ADV**

**Continuation Sheet for Form ADV Part II**

Applicant:	SEC File Number:	Date:
<b>Clarus Financial, LLC</b>	801- 67739	09/30/2009

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>Clarus Financial, LLC</b>		IRS Empl. Ident.No.: <b>20-3940657</b>
Item of Form (identify)	Answer	
<b>1D.</b>	<p>Clarus Financial (CF) provides discretionary and non-discretionary investment management of accounts for individuals, trusts and charitable organizations as its primary service. Comprehensive financial planning is a secondary service of the Applicant. The client's financial position, investment experience and needs are taken into consideration when implementing the portfolio.</p> <p>CF may contract with third party managers whose fees are separate from CF's. Some third party managers provide their services on a wrap fee platform. For accounts managed on such platforms, Client pays combined fees for investment advice and brokerage services rather than investment management fees plus separate transaction-based charges for brokerage execution. Client will be presented a copy of both the third party's Form ADV Part II or other applicable disclosure documents and CF's fully disclosing the services and fee schedules being provided to the Client. Third party managers may have established account size minimums. CF will recommend Client to third party managers that have complimentary management styles, investment philosophies, account types and acceptable minimum account sizes.</p> <p>CF may offer its services to customers through an internet platform by Myfinancialadvice, Inc. (MFA). MFA provides this service under the name Myfinancialadvice.com. MFA, through the MFA website, may provide the name of CF to customers who request advice or assistance in financial matters. Before any services are provided, CF and the customer must agree on the services to be provided and the amount of the fee that CF will charge for those services. The fee will be based on the hourly rates described below; however, the amount of time to be spent and the total amount of the fee may be negotiable, depending on the nature of the question and the amount of detail that the customer requests in the response. The total amount of the fee must be paid by credit card through the MFA website at the time CF commences providing the services. Under normal circumstances, fees are not refundable once they are paid, unless CF fails to provide the services within a reasonable time. CF and customer will agree on the amount of time it will take CF to provide the services. Ordinarily MFA expects that services will be completed within 30 days or less. It is MFA's policy, however, that fees for services or any portion of the services that have not been completed within six months from the date of commencement of the services must be immediately refunded to the customer. In no event will fees be paid more than six months before the services are completed. If services are partially completed within the six-month period, the fees will be prorated. Fees are collected by MFA who pays CF 50% to 75% of the total amount of the fees paid by the customer. The actual percentage may depend on the type of services CF provides and the amount CF expects the services to take. MFA may pay a portion of the fee to third parties who sponsor the MFA website or who provide advertising space for MFA services or links to the MFA website. The balance of the fee is kept by MFA. As part of receiving services through the MFA, the consumer and CF must agree not to contact each other or obtain services directly. The fee that CF charges customers for services CF provides through MFA are the same hourly rates as the fees that CF charges its other clients.</p> <p>Clients are charged an hourly fee of \$150 per hour, a fixed annual fee or a variable fee based on the percentage of assets managed. According to the Management Agreement, the accounts are billed as follows:</p>	

**Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).**

**Schedule F of  
Form ADV**

**Continuation Sheet for Form ADV Part II**

Applicant:	SEC File Number:	Date:
<b>Clarus Financial, LLC</b>	801- 67739	09/30/2009

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>Clarus Financial, LLC</b>		IRS Empl. Ident.No.: <b>20-3940657</b>										
Item of Form (identify)	Answer											
<b>1D. (continued)</b>	<p><u>Discretionary and Non-Discretionary Accounts</u></p> <table border="0"> <thead> <tr> <th><u>Portfolio Size</u></th> <th><u>Annual Advisory Fee</u></th> </tr> </thead> <tbody> <tr> <td>Up to \$500,000</td> <td>1.25%</td> </tr> <tr> <td>\$500,000 to \$1,000,000</td> <td>1.12%</td> </tr> <tr> <td>\$1,000,000 to \$2,000,000</td> <td>1.00%</td> </tr> <tr> <td>Over \$2,000,000</td> <td>Negotiable</td> </tr> </tbody> </table> <p><u>Self Directed Accounts</u></p> <p>The Applicant manages non-discretionary accounts for clients with a limited scope of service including tracking cost basis, facilitating cash management, quarterly statements and executing client directed trades. The fee for this service is a fixed annual amount of \$300 per household.</p> <p><u>529 College Savings Plans</u></p> <p>The Applicant manages non-discretionary Section 529 Plan accounts for clients. These accounts receive the services listed above under "Self Directed Accounts" plus an initial consultation. The fee for this service is \$250 for the initial consultation and account setup, then an annual fee of \$300 per household.</p> <p><u>SIMPLE IRA Retirement Plans</u></p> <p>The Applicant manages non-discretionary SIMPLE IRA accounts for small businesses and their employees. These accounts receive the services listed above under the "Self Directed Accounts" plus an initial consultation and annual meetings with plan participants. The fee for this service is \$500 for the initial consultation and participant account setup and \$400 per year to the plan sponsor thereafter.</p> <p>Advisory fees are to be paid quarterly, in advance, due on the first day of each calendar quarter. The calculation is based on the asset value of the account on the last business day of the previous quarter. The Client may terminate the Management Agreement at any time by providing written notice to the Applicant. In the event of termination, the Client will be entitled to a prorated refund of any prepaid fees based on the number of days remaining in the quarter, the fee will be determined on a pro rata basis for the portion of the calendar quarter during which the Applicant provided services. Fixed annual fee for non-discretionary accounts are also due on the first calendar day of each quarter and are not prorated for mid-quarter termination or inception.</p>		<u>Portfolio Size</u>	<u>Annual Advisory Fee</u>	Up to \$500,000	1.25%	\$500,000 to \$1,000,000	1.12%	\$1,000,000 to \$2,000,000	1.00%	Over \$2,000,000	Negotiable
<u>Portfolio Size</u>	<u>Annual Advisory Fee</u>											
Up to \$500,000	1.25%											
\$500,000 to \$1,000,000	1.12%											
\$1,000,000 to \$2,000,000	1.00%											
Over \$2,000,000	Negotiable											
<b>5.</b>	<p>Professional employees must have a high level of intellectual and educational ability, evidenced by a college education and completion and certification by the Certified Financial Planner Board of Standards, Inc. Professional employees may be hired who are working toward this certification or who possess the CFA designation.</p>											

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).



**Schedule F of  
Form ADV**

**Continuation Sheet for Form ADV Part II**

Applicant:	SEC File Number:	Date:
Clarus Financial, LLC	801- 67739	09/30/2009

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>Clarus Financial, LLC</b>		IRS Empl. Ident.No.: <b>20-3940657</b>
Item of Form (identify)	Answer	
6.	<p>Gregory T. Busch Education: Certified Financial Planner – 2003 College of Financial Planning / CFP Professional Education Program - 1998 Master of Architecture - 1982 – Architecture California St Polytechnic University BS of Architecture - 1977 – Ohio State University</p> <p>1/2006 – Present – Managing Principal, Clarus Financial, LLC 7/2000 – 6/2007 – Registered Representative, FSC Securities Corporation</p> <p>Year of Birth: 1955</p>	
9.	<p><u>Participation or Interest in Client Transactions</u></p> <p>CF and its representatives may engage in personal securities transactions. The personal securities transactions of CF and its representatives may raise potential conflicts of interest when such persons trade in a security that is 1) owned by a client or 2) considered for purchase or sale for a client. CF has adopted policies and procedures that are intended to ensure that transactions are effected for clients in a manner that is consistent with their fiduciary duty and in accordance with applicable law. Persons who wish to purchase or sell securities of the types purchased or sold for clients may do so only in a manner consistent with CF policies and procedures.</p> <p><u>Code of Ethics</u></p> <p>CF has adopted a Code of Ethics (the “Code”) to address securities-related conduct. The Code focuses primarily on fiduciary duty, personal securities transactions, insider trading, gifts, and conflicts of interest. The Code includes CF’s policies and procedures developed to protect client’s interests in relation to the following topics:</p> <ul style="list-style-type: none"><li>• The duty at all times is to place the interests of clients first;</li><li>• The requirement that all personal securities transactions be conducted in such a manner as to be consistent with the code of ethics and to avoid any actual or potential conflict of interest or any abuse of an employee’s position of trust and responsibility;</li><li>• The principle that investment adviser personnel should not take inappropriate advantage of their positions;</li><li>• The fiduciary principle that information concerning the identity of security holdings and financial circumstances of clients is confidential; and</li><li>• The principle that independence in the investment decision-making process is paramount.</li></ul> <p>CF provides a copy of the Code to any client or prospective client upon request.</p>	
12.	<p><u>Investment or Brokerage Discretion</u></p> <p>CF has authority to determine the type and amount of securities to be bought and sold. CF has limited withdrawal power including the deduction of advisory fees. Discretion includes purchasing authority for securities such as mutual funds, equities, bonds, convertibles, government bonds and municipal bonds. Discretion does not include purchases on margin, or of options and futures, unless through a mutual fund or ETF (Exchange Traded Fund).</p>	

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

**Schedule F of****Form ADV****Continuation Sheet for Form ADV Part II**

Applicant:

**Clarus Financial, LLC**

SEC File Number:

**801- 67739**

Date:

**09/30/2009**

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>Clarus Financial, LLC</b>		IRS Empl. Ident.No.: <b>20-3940657</b>
Item of Form (identify)	Answer	
<b>12. (continued)</b>	<p>Typically in third party investment advisory services, the third-party money manager exercises discretion in the management of client accounts. All securities transactions are decided upon and executed by that manager. CF and its representatives do not manage, or obtain discretionary authority over the assets in accounts participating in these programs. However, clients may grant representatives the discretionary authority to hire and fire such third-party managers.</p> <p>CF may recommend that clients establish brokerage accounts with the Schwab Institutional division of Charles Schwab &amp; Co., Inc. (Schwab) or SEI Private Trust Company (SEI), a registered broker-dealer, member SIPC, to maintain custody of clients' assets and to effect trades for their accounts. In situations where no load variable annuities are to be managed by CF, CF may offer products through Advisor Resources (Monumental Life) or from Charles Schwab insurance services. CF is independently owned and operated and not affiliated with Schwab or SEI. Schwab and SEI provide CF with access to its institutional trading and custody services, which are typically not available to Schwab and SEI retail investors. These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the advisor's clients' assets is maintained in accounts at Schwab Institutional and are not otherwise contingent upon Advisor committing to Schwab any specific amount of business (assets in custody or trading). Schwab's and SEI's services include brokerage, 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.</p> <p>For CF's client accounts custodied with Schwab or SEI, those custodians generally do not charge separately for custody but are compensated by account holders through commissions or other transaction-related fees for securities trades that are executed through or that settle into those respective custodial accounts.</p> <p>Schwab also makes available to CF other products and services that benefit CF but may not benefit its clients' accounts. Some of these other products and services assist CF in managing and administering clients' accounts. These include software and other technology that provide access to client account data (such as trade confirmations and account statements); facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts); provide research, pricing information and other market data; facilitate payment of CF's fees from its clients' accounts; and assist with back-office functions, recordkeeping and client reporting. Many of these services generally may be used to service all or a substantial number of CF's accounts, including accounts not maintained at Schwab Institutional. Schwab Institutional also makes available to CF other services intended to help CF manage and further develop its business enterprise. These services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, and marketing. In addition, Schwab may make available, arrange and/or pay for these types of services rendered to CF by independent third parties. Schwab Institutional may discount or waive fees it 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 CF. While as a fiduciary, CF endeavors to act in its clients' best interests, and CF's recommendation that clients maintain their assets in accounts at Schwab or SEI may be based in part on the benefit to CF of the availability of some of the foregoing products and services and not solely on the nature, cost or quality of custody and brokerage services provided by Schwab or SEI, which may create a potential conflict of interest.</p>	

**Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).**

**Schedule F of  
Form ADV**

**Continuation Sheet for Form ADV Part II**

Applicant:	SEC File Number:	Date:
Clarus Financial, LLC	801- 67739	09/30/2009

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>Clarus Financial, LLC</b>		IRS Empl. Ident.No.: <b>20-3940657</b>
Item of Form (identify)	Answer	
<b>12. (continued)</b>	<p>Usually, services offered by CF utilize the services of a particular broker/dealer. Thus, by assisting the client in selecting such a program, CF may also be deemed to be assisting the client in selecting a broker/dealer. In certain programs, the client is asked to select a particular broker/dealer to execute trades for the client's account and/or to act as custodian for the account. In those programs, representatives assist the client in making such selection.</p> <p>Notwithstanding such compensation, CF strives to serve the best interest of the clients. CF does not warrant or represent that commissions for transactions implemented through Schwab or SEI will be lower than commission available if clients use another brokerage firm. CF believes, however, that the overall level of services and support provided to clients by CF outweighs the potentially lower transactions cost available under other brokerage arrangements.</p> <p>Factors considered in selecting a broker/dealer, include the existing broker/dealer relationships with CF, financial strength, reputation, reporting, execution pricing and research. The broker/dealers charge commission rates which are generally considered discounted from customary retail commission rates. However, the commissions and/or transaction fees charged by the broker-dealers may be higher or lower than those charged by other broker-dealer/custodians. Further, the fees charged by any designated broker-dealer/custodian, are exclusive of, and in addition to, CF's investment management fees. In addition, the clients shall also incur charges imposed at the mutual fund level (e.g. management fees and other fund expenses).</p> <p>CF manages each portfolio on an individual basis primarily utilizing mutual funds. Individual stock and bond positions may also be used secondarily. Where an investment opportunity exists for multiple client accounts, in an individual stock or bond position, CF may "bunch" or "block" trade such orders for many client accounts that are executed simultaneously. Those trades are then allocated to client accounts based on the average price of security purchased in accordance with CF's Block Trade Policy.</p>	
<b>13.</b>	<p><u>Additional Compensation</u></p> <p>CF may recommend Schwab for the execution and settlement of client transactions and custody of their assets. CF receives products and services from Schwab, including software to enable direct electronic downloading of client account information, electronic trading, and access to investment research and information provided by broker-dealers. Clients do not pay higher commissions as a result of these products and services furnished by broker-dealers to CF. CF earns no commissions from these transactions in broker-dealer accounts, nor does CF earn 12b-1 fees in connection with the purchase and holding of mutual fund shares. Transaction charges or other charges for services to clients by broker-dealers may be more or less than other broker-dealers that have not been recommended by CF for comparable services. Clients are not required to use a specific broker-dealer to retain the services of CF.</p> <p><u>Client Referrals</u></p> <p>CF maintains a referral relationship with MFA. MFA is registered as an Investment Adviser with the Securities and Exchange Commission (SEC) and may be considered a Solicitor under the Investment Advisers Act of 1940 and/or under certain state laws. However, the services of MFA are limited to (i) obtaining the names of persons with credentials that appear to qualify those persons to give advice in various areas; (ii) providing a web-based platform where a customer can obtain a list of consultants who may be available to assist the customer with a specific question; (iii) collecting</p>	

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

**Schedule F of  
Form ADV**

**Continuation Sheet for Form ADV Part II**

Applicant:	SEC File Number:	Date:
<b>Clarus Financial, LLC</b>	<b>801- 67739</b>	<b>09/30/2009</b>

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>Clarus Financial, LLC</b>		IRS Empl. Ident.No.: <b>20-3940657</b>
Item of Form (identify)	Answer	
<b>13. (continued)</b>	the fees from the customer for the services once the customer selects an adviser and negotiates a price for the service; (iv) paying the select adviser for providing the services once the services have been completed; and (v) conducting the follow-ups with customers to verify customer satisfaction with the services. MFA is not responsible for determining or providing any advice to customers nor does MFA recommend any specific consultant to customers. Customers must evaluate and choose consultants on their own, after being provided with information about the consultants disclosed or described on the MFA website.	

**Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).**