

Uniform Application for Investment Adviser Registration

OMB APPROVAL

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Name of Investment Adviser:

Tudor Financial, Inc.

Address: (Number and Street)	(City)	(State)	(Zip Code)	Area Code	Telephone Number
8111 Timberlodge Trail	Dayton	OH	45458-2103	(937)	439-9292

**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.**

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>20</u> | % |
| <input checked="" type="checkbox"/> | (2) | Manages investment advisory accounts not involving investment supervisory services | <u>20</u> | % |
| <input checked="" type="checkbox"/> | (3) | Furnishes investment advice through consultations not included in either service described above | <u>20</u> | % |
| <input type="checkbox"/> | (4) | Issues periodicals about securities by subscription | _____ | % |
| <input type="checkbox"/> | (5) | Issues special reports about securities not included in any service described above | _____ | % |
| <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 | _____ | % |
| <input checked="" type="checkbox"/> | (7) | On more than an occasional basis, furnishes advice to clients on matters not involving securities | <u>20</u> | % |
| <input type="checkbox"/> | (8) | Provides a timing service | _____ | % |
| <input checked="" type="checkbox"/> | (9) | Furnishes advice about securities in any manner not described above | <u>20</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 |
| | | <input checked="" type="checkbox"/> <input type="checkbox"/> |

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 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 checked="" 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 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).

3. Types of Investments. Applicant offers advice on the following: (check those that apply)

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

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 checked="" 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 checked="" type="checkbox"/> Inspections of corporate activities | (6) <input checked="" type="checkbox"/> Annual reports, prospectuses, filings with the Securities and Exchange Commission |
| (3) <input checked="" type="checkbox"/> Research materials prepared by others | (7) <input 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
(securities held at least a year) | (5) <input checked="" type="checkbox"/> Margin transactions |
| (2) <input checked="" type="checkbox"/> Short term purchases
(securities sold within a year) | (6) <input type="checkbox"/> Option writing, including covered options, uncovered 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 checked="" type="checkbox"/> Short sales | |

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

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 checked="" 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 checked="" 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.)

Applicant:
Tudor Financial, Inc.

SEC File Number:
801- 41567

Date:
01/01/2009

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.

Reviews are made on an annual basis or more frequently as needed or requested by a client, changes in tax laws or changes in the products in which the client has invested. Reviews are conducted by a qualified financial planner and consultant.

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

The client will receive regular reports directly from the mutual fund, insurance company or other investment company serving as custodian for the investment. Such reports will depend upon the regular reporting procedures of each investment custodian. The applicant also has the capacity to provide customized reports to brokerage account clients.

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

12. Investment or Brokerage Discretion.

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

- | | Yes | No |
|--|-------------------------------------|--------------------------|
| (1) securities to be bought or sold? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (2) amount of the securities to be bought or sold? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (3) broker or dealer to be used? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (4) commission rates paid? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

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
<input type="checkbox"/> | No
<input checked="" type="checkbox"/> |
| B. directly or indirectly compensates any person for client referrals? | Yes
<input checked="" type="checkbox"/> | No
<input type="checkbox"/> |

(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:
Tudor Financial, Inc.

SEC File Number:
801- **41567**

Date:
01/01/2009

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV:

Tudor Financial, Inc.

IRS Empl. Ident. No.:

31-1241724

Item of Form (identify)	Answer																		
	<p>Tudor Financial, Inc. provides personal financial planning and asset management services. The objective of these services is to assist the client in ascertaining the client's financial status, and through a thorough analysis, assist the client in establishing financial and investment objectives and achieve those objectives. In a typical situation, Tudor Financial, Inc. will gather data from the client, analyze information, establish objectives and prepare written financial recommendations.</p> <p>In addition, Tudor Financial, Inc. provides asset management for clients' funds on either a discretionary or nondiscretionary basis. Tudor Financial, Inc. will assist the client by providing investment advice based upon the individual needs of the client. Individual needs include, but are not limited to, such factors as investment objectives of the client, net worth of the client, other investments, time horizons, annual income and insurance in force.</p> <p>The fee for creating and preparing a comprehensive plan is \$145.00 per hour. Fees can also be charged for financial planning services on a flat annual rate as determined by client and advisor. In addition, a fee for asset management will be charged depending on whether an account is primarily invested in equities, a balanced portfolio or mutual funds.</p> <p>Fee schedules below are based on a percentage per annum of assets under management. Fees are billed either directly to the client or to the client's custodian. The mutual fund companies in the Mutual Fund Management Program charge their own underlying fees. The following fee schedules are currently applicable:</p> <p style="text-align: center;"><u>Equity/Mutual Fund Management - Fee & Discounted Transaction Program</u></p> <table border="0"> <thead> <tr> <th><u>Principal Amount</u></th> <th><u>Annual Fee*</u></th> </tr> </thead> <tbody> <tr> <td>\$0-25,000 (If account is less than \$25,000)</td> <td>1.50%</td> </tr> <tr> <td>\$0-250,000</td> <td>1.25</td> </tr> <tr> <td>\$250,001 - 5,000,000</td> <td>1.00</td> </tr> <tr> <td>\$6,000,000 and above</td> <td>.75</td> </tr> </tbody> </table> <p style="text-align: center;"><u>Balanced Program - Fee & Discounted Transaction Program</u></p> <table border="0"> <thead> <tr> <th><u>Principal Amount</u></th> <th><u>Annual Fee*</u></th> </tr> </thead> <tbody> <tr> <td>\$0 - 250,000</td> <td>1.25%</td> </tr> <tr> <td>\$250,001 - 5,000,000</td> <td>1.00</td> </tr> <tr> <td>\$6,000,000 and above</td> <td>.75</td> </tr> </tbody> </table> <p>* We have established a minimum annual fee to service clients of \$300.00, excluding group retirement accounts. Accounts will incur the greater of the minimum or the calculated fee as indicated above.</p>	<u>Principal Amount</u>	<u>Annual Fee*</u>	\$0-25,000 (If account is less than \$25,000)	1.50%	\$0-250,000	1.25	\$250,001 - 5,000,000	1.00	\$6,000,000 and above	.75	<u>Principal Amount</u>	<u>Annual Fee*</u>	\$0 - 250,000	1.25%	\$250,001 - 5,000,000	1.00	\$6,000,000 and above	.75
<u>Principal Amount</u>	<u>Annual Fee*</u>																		
\$0-25,000 (If account is less than \$25,000)	1.50%																		
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Complete amended pages in full, circle amended items and file with execution page (page 1).

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

Applicant:
Tudor Financial, Inc.

SEC File Number:
801- **41567**

Date:
01/01/2009

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Tudor Financial, Inc.		IRS Empl. Ident. No.: 31-1241724
Item of Form (identify)	Answer	
Part II, Item 4(A) 5	In addition to the use of fundamental, technical and cyclical analysis methods, Tudor Financial, Inc. places emphasis upon the needs and goals of individual clients. Recommendations concerning investments are based upon the results of individual analysis.	
Part II, Item 5	Tudor Financial, Inc. requires that those individuals involved in the financial process have some educational and business background which gives them expertise in the financial planning area. As a result, the individuals involved will either have professional degrees as CPA's, CFP's, ChFC's etc., and/or will have experience in counseling clients in financial matters.	
Part II, Item 6	<p>The following individuals provide investment advice to clients:</p> <p>Grant S. Donaldson, MS, CPA, 11/11/59 B.S. Accounting, CPA, Series 7, 63, Life, Health & Annuity licensed, MBA Program U of D, Master of Science in Financial Analysis, Principal of Tudor Financial, Inc. for more than 18 years, over 24 years of financial services experience.</p> <p>Grant S. Donaldson, MS, CPA is an officer/owner of Tudor Financial, Inc.</p> <p>Drew A. Brazie, ChFC, FIC, LUTC, 8/12/1951, Series 7, 63, 65, Life, Health and Annuity licensed, affiliated with Westminster Financial Securities & Advisory, over 26 years of financial services experience.</p> <p>Christine P.Y. Tenbarge, CFP, ChFC, CLU 12/11/1948, Series 7, 24, 27, 53, 63, 65, Life, Health & Annuity licensed, affiliated with Westminster Securities & Advisory, over 37 years of financial services experience.</p> <p>Roger Schalnatt, 10/16/1939, Bachelor of Arts, Master of Divinity, Series 6, 62, 63, Life, Health & Annuity licensed, affiliated with Westminster Financial Securities & Advisory, over 24 years of financial services experience.</p> <p>Regulations require that a Chief Compliance Officer be designated for Registered Investment Advisory firms to ensure certain compliance and supervisory procedures are followed. The requirements for this position include professional experience, education and authority to properly implement and enforce procedures. Tudor Financial, Inc. has designated Grant S. Donaldson, CPA to serve in this capacity.</p>	
Part II, Item 8	Some of the individuals who are involved in the financial planning process on behalf of Tudor Financial, Inc. are also licensed to sell life insurance and other financial products. The client is under no obligation to purchase such products from the planner. However, in the event that the client so chooses, the advisor has the capacity to execute such transactions as an independent provider of those products, typically at reasonable cost. These activities typically are not relatively material to affiliated advisors. Firm advisors have also established professional connections with pension/retirement advisory firms to facilitate the group retirement market. At this time, there are no financial connections to these organizations, rather, their services are facilitators of the group retirement process.	

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

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

Applicant:
Tudor Financial, Inc.

SEC File Number:
801- **41567**

Date:
01/01/2009

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

I. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV:

Tudor Financial, Inc.

IRS Empl. Ident. No.:

31-1241724

Item of Form (identify)	Answer
Part II, Item 9	<p>Tudor Financial representatives will often purchase investment securities that are the same or similar to those offered to clients. As noted below, transactions for clients may be transacted through Westminster Financial Securities, Inc. for discounted commission cost. Periodically, representatives wish to participate in the same quality investment opportunities as clients. Representatives make every effort, and securities compliance personnel confirm, that no conflicts of interest or front-running occurs with these investment purchases. The primary goal of Tudor Financial representatives is to keep client interests first. These transactions are effected through Westminster Financial Securities as noted below.</p> <p>It is the policy of Tudor Financial, Inc. to not share client information with any outside parties, other than those required by law. Client information will never be directly provided by Tudor Financial, Inc. to mailing list companies or financial institutions other than those with which the client does transactions. Client information is held in the strictest confidence.</p>
Part II, Item 12 A, B	<p>Individuals associated with Tudor Financial, Inc. may also be affiliated with Westminster Financial Securities through which securities transactions will be transacted. Transactions effected on behalf of fee-based clients may be higher or lower than other brokerage firms, but are typically discounted. Transactions effected through Westminster have historically been executed in a reasonable manner at reasonable cost. Tudor Financial, Inc. has a policy of doing in-house securities and investment strategy research; therefore, Westminster is typically used as a clearing firm to effect transactions for the convenience of Tudor Financial, Inc.</p>
Part II, Item 13	<p>In some cases, Tudor Financial, Inc. may compensate a referral/solicitor source for their efforts and input into a client relationship. This compensation is based on the level of assets managed on behalf of referred clients. Clients acknowledge this arrangement when they sign the Solicitor's Agreement form.</p>

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

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