

FORM ADV**Uniform Application for Investment Advisor Registration****Part II – Page 1**

Name of Investment Advisor:	
Safran Wealth Advisors, LLC	
Address: (Number and Street) (City) (State) (Zip Code)	Area Code: Telephone Number:
641 Lexington, Avenue, 14 th fl. New York, NY 10022	212-328-9530

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

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(Schedule 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:

Safran Wealth Advisors, LLC

SEC File Number:

801-70797

Date:

1/7/2010

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 | 50% |
| <input checked="" type="checkbox"/> | (2) | Manages investment advisory accounts not involving investment supervisory services | 25% |
| <input checked="" type="checkbox"/> | (3) | Furnishes investment advice through consultations not included in either service described above | 15% |
| <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 | 10% |
| <input type="checkbox"/> | (8) | Provides a timing service | % |
| <input type="checkbox"/> | (9) | Furnishes advice about securities in any manner not described above | % |

(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 the 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 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 Advisor 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 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:

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801-70797

Date:

1/7/2010

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 | <input type="checkbox"/> I. Options contracts on: |
| <input type="checkbox"/> (3) foreign issues | <input type="checkbox"/> (1) securities |
| | <input type="checkbox"/> (2) commodities |
| <input type="checkbox"/> B. Warrants | |
| <input checked="" type="checkbox"/> C. Corporate debt securities | <input type="checkbox"/> J. Futures contracts on: |
| (other than commercial paper) | <input type="checkbox"/> (1) tangibles |
| | <input type="checkbox"/> (2) intangibles |
| <input checked="" type="checkbox"/> D. Commercial paper | |
| <input checked="" type="checkbox"/> E. Certificates of deposit | <input type="checkbox"/> K. Interests in partnerships investing in: |
| <input checked="" type="checkbox"/> F. Municipal securities | <input type="checkbox"/> (1) real estate |
| | <input type="checkbox"/> (2) oil and gas interests |
| <input type="checkbox"/> G. Investment company securities | <input type="checkbox"/> (3) other (explain on Schedule F) |
| <input checked="" type="checkbox"/> (1) variable life insurance | <input type="checkbox"/> L. Other (explain on Schedule F) |
| <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 checked="" type="checkbox"/> Cyclical |
| (2) <input checked="" type="checkbox"/> Fundamental | (5) <input type="checkbox"/> Other (explain on Schedule F) |
| (3) <input 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 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) | |
| (4) <input type="checkbox"/> Short sales | (7) <input type="checkbox"/> Other (explain on Schedule F) |

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:

Safran Wealth Advisors, LLC

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801-70797

Date:

1/7/2010

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 Advisor.
- 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 Advisor | <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 Advisor 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.)

FORM ADV**Part II - Page 5**

Applicant:

Safran Wealth Advisors, LLC

SEC File Number:

801-70797

Date:

1/7/2010

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.

The advisor assigned to the client reviews all Safran Wealth Advisors accounts on an on going basis throughout the year. More frequent reviews may be triggered by material market, economic and/or political events.

Erika Safran, CFP, is responsible for all account reviews at this time.

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

Clients will receive quarterly reports tracking their portfolio performance. In addition, they will receive periodic updates on the various aspects of financial planning as it pertains to their situation.

Applicant:

Safran Wealth Advisors, LLC

SEC File Number:

801-70797

Date:

1/7/2010

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

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

Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
--	--------------------------------

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 checked="" type="checkbox"/> | No
<input type="checkbox"/> |
| B. directly or indirectly compensates any person for client referrals? | Yes
<input type="checkbox"/> | No
<input checked="" 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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>
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**Schedule F of
Form ADV
Continuation Sheet for Form ADV Part II**

Advisor:	SEC File Number:	Date:
Safran Wealth Advisors, LLC	801-70797	1/7/2010

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

1.	Full name of Advisor exactly as stated in Item 1A of Part I of Form ADV: Safran Wealth Advisors, LLC	IRS Empl. Ident. No.: 11-2786410
Item of Form (identify)	Answer	
Item 1.D	<p><u>Wealth Management Services</u></p> <p>Safran Wealth Advisors, LLC ("the Advisor") provides fee-only Wealth Management Services for clients seeking a comprehensive plan to manage their wealth along with ongoing professional management of their assets. The two primary portions of Wealth Management Services are Comprehensive Financial Planning and Investment Management to help you achieve your life goals.</p> <p><u>1. Comprehensive Financial Planning</u></p> <p>The Advisor provides financial planning and consulting services consistent with a clients' financial and tax status, in addition to their risk profile and investment objectives. The Advisor may also provide general non-securities advice on topics that may include tax and budgetary planning, estate planning and business planning.</p> <p>In order to create the <u>Financial Plan</u> we adhere to the financial planning process which consists of a series of steps taken to help our client, accomplish goals:</p> <p>The first step includes goal development, and gathering and analyzing data about your income, expenses, taxes, insurance coverage, retirement plans, wills and trusts, and other information pertinent to your overall financial situation. We help you to identify your objectives and then create a written customized plan. The financial plan includes a Net Worth and Income Statement, detailed analysis of your financial issues, and recommendations and strategies for achieving your goals. We assist you in implementing the recommendations and can help coordinate the process for you. Finally, the <u>Financial Plan</u> and recommended strategies are monitored on an ongoing basis for needed changes.</p> <p>In general, financial planning encompasses one or more of the following areas:</p> <ul style="list-style-type: none"> • <i>Cash Flow Analysis</i> • <i>Tax Planning</i> • <i>Retirement Planning</i> • <i>Education Planning</i> • <i>Estate Planning</i> • <i>Investment Analysis</i> • <i>Risk Management and Asset Protection</i> <p>Financial planning is a comprehensive process, requiring review and analysis of all aspects of your financial situation. In cases where a targeted review is required, we prepare an analysis and evaluation of a core area of financial planning. Advisor will consult with you to gain better insight into your individual needs, goals and objectives.</p>	

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

Advisor:	SEC File Number:	Date:
Safran Wealth Advisors, LLC	801-70797	1/7/2010

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

1.	Full name of Advisor exactly as stated in Item 1A of Part I of Form ADV: Safran Wealth Advisors, LLC	IRS Empl. Ident. No.: 11-2786410					
Item of Form (identify)	Answer						
Item 1.D cont.	<p>2. Investment Management</p> <p>Using the <u>Financial Plan</u> as a guide, Safran Wealth Advisors, LLC ("the Advisor") will develop an investment policy statement which describes how we will allocate your assets between various investment classes.</p> <p>The Advisor provides <u>Investment Management</u> and advisory services to our clients on a discretionary or a non-discretionary basis. The services include, among other things, providing advice regarding asset allocation, investment selection, and rebalancing procedures guided by the <u>Financial Plan</u> and stated objectives of the client. In addition, the Advisor considers the client's risk profile and financial status prior to making any recommendations.</p> <p>Our philosophy relies on a long-term investment strategy determined by your needs and objectives. We design your portfolio based on your goals as identified during the financial planning process. Goals may range from current income with capital preservation to long-term growth.</p> <p>Utilizing allocation strategies, our client portfolios are diversified to minimize sector and industry risk. Advisor may use any of the following securities to achieve this objective: stocks, bonds, mutual funds, index funds, leveraged index funds, closed-end funds, and other publicly traded securities.</p> <p>This service is offered on a discretionary and non-discretionary basis.</p> <p>Safran Wealth Advisors, LLC is compensated for Wealth Management Services based on a fixed retainer schedule. An initial deposit of 50% of the fee is required. Fees are prorated for accounts opened during the quarter. The deposit amount is noted in the initial client agreement. Ongoing fees will be billed quarterly in arrears and are negotiable.</p> <p>Wealth Management Fee Schedule – annualized-</p> <p>Client fees are a fixed retainer based on the following schedule.</p> <table border="0"> <tr> <td>Investable Assets</td><td>Annual Fee</td></tr> <tr> <td>Up to \$599,999</td><td>\$6,000</td></tr> <tr> <td>Over \$600,000</td><td>\$6,000 plus \$1,000 for each additional \$200,000 in investable assets</td></tr> </table> <p>The fees are based on the value of investable assets at the time of engagement and may be adjusted every three year period based on Advisor's fee structure at that time. An initial deposit of 50% of the fee is required. Ongoing fees will be billed quarterly in arrears. The deposit amount is noted in the initial client agreement.</p>	Investable Assets	Annual Fee	Up to \$599,999	\$6,000	Over \$600,000	\$6,000 plus \$1,000 for each additional \$200,000 in investable assets
Investable Assets	Annual Fee						
Up to \$599,999	\$6,000						
Over \$600,000	\$6,000 plus \$1,000 for each additional \$200,000 in investable assets						

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

Advisor:	SEC File Number:	Date:
Safran Wealth Advisors, LLC	801-70797	1/7/2010

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

1.	Full name of Advisor exactly as stated in Item 1A of Part I of Form ADV: Safran Wealth Advisors, LLC	IRS Empl. Ident. No.: 11-2786410
Item of Form (identify)	Answer	
Item 1.D cont.	<p>Investable assets include investment and bank accounts, employee stock options, individual and employer sponsored retirement plans, etc.</p> <p>Safran Wealth Advisors, LLC may supervise or provide consultation on the assets as part of the Wealth Management Service.</p> <p>The client will have a period of five (5) business days from the date of signing the investment advisory agreement to unconditionally rescind the agreement and receive a full refund of all fees. Thereafter, either party may terminate the investment advisory agreement with 30 days written notice.</p> <p>The account custodian may charge fees, which are in addition to and separate from the investment advisory service fee. Custodians may charge accounts for various transaction costs, retirement plan and administration fees. In addition, some mutual fund assets deposited in the account may have been subject to deferred sales charges and 12 (b)(1) fees. Mutual funds also have annual expenses, which are described in each fund's prospectus.</p> <p>Advisory clients should also note that fees for comparable services vary and lower fees for comparable services may be available from other sources.</p> <p>Upon termination, fees will be prorated to the date of termination and the unearned portion of the fee will be refunded to the client.</p> <p>Financial Planning Engagement Service</p> <p>For clients with less than \$600,000 in investible assets who need advice in integrating the financial elements of their life, the <u>Financial Planning Engagement Service</u> is available for a fixed fee. Clients will receive a written customized financial plan for a flat fee based on the complexity, time, and expertise required to complete the plan or project and the range of services provided.</p> <p>Clients who qualify for the <u>Financial Planning Engagement Service</u> are billed a fixed fee that generally ranges from \$2,500 to \$5,000. Subsequent annual reviews are billed at a fixed fee of 60% of the amount paid for the original financial plan.</p> <p>An initial deposit of 50% of the fee is required. Ongoing fees will be billed quarterly in arrears. The deposit amount is noted in the initial client agreement.</p> <p>It is anticipated that the financial plan produced will be delivered within six months or sooner of the date of the Agreement. The Advisor considers fees for financial planning or a consulting project to be earned as progress is realized toward creation of the plan or completion of the service. Under no circumstances will the Advisor earn fees in excess of \$500 more than six months in advance of services rendered.</p>	

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

Advisor:

Safran Wealth Advisors,
LLC

SEC File Number:

801-70797

Date:

1/7/2010

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

<p>1. Full name of Advisor exactly as stated in Item 1A of Part I of Form ADV: Safran Wealth Advisors, LLC</p>	<p>IRS Empl. Ident. No.: 11-2786410</p>
Item of Form (identify)	Answer
<p>Item 1.D cont.</p>	<p>A client will have a period of five (5) business days from the date of signing the agreement to unconditionally rescind the agreement and receive a full refund of all fees. Thereafter, the client may terminate the agreement by providing the Advisor with written notice prior to delivery of the plan or completion of the service.</p> <p>Upon termination, fees will be prorated to the date of termination and the unearned portion of the fee will be refunded to the client.</p> <p>Hourly fees</p> <p>In the event a client's targeted needs can be addressed by a limited engagement, Safran Wealth Advisors, LLC may charge a fee at the rate of \$300 per hour.</p>
<p>Item 5</p>	<p>Education & Business Standards</p> <p>All Investment Advisor Representatives retained by Advisor are required to have suitable experience in fields directly related to financial planning and investment management. Each Investment Advisory Representative must be a Certified Financial PlannerTM or be a candidate for the CFP[®] designation. Each must also have the required examinations and/or qualifications to act as such representative as required by law.</p>
<p>Item 6</p>	<p>Biographical Information</p> <p>Erika Safran, CFP[®] Year of Birth: 1957 Education: SUNY at Buffalo – Bachelor of Science Certified Financial PlannerTM (CFP[®])</p> <p>Business: 1992 – 2009 Financial Asset Management Corp. <i>Position:</i> Vice President</p> <p>2009-Present Safran Wealth Advisors, LLC <i>Position:</i> CEO/President</p>
<p>Item 9.E</p>	<p>Participation or Interest in Client Transactions</p> <p>Owners, officers, directors and employees of Advisor are permitted to personally invest their own monies in stocks (OTC and Listed), bonds, investment company products and other publicly traded securities, which may also be, from time to time, recommended to clients. Such investment purchases are independent of investment decisions made on behalf of Advisor's clients. Personal trading activities are monitored by our CEO to ensure that such activities do not impact upon client security or create conflicts of interest.</p>

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

Advisor:	SEC File Number:	Date:
Safran Wealth Advisors, LLC	801-70797	1/7/2010

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

1.	Full name of Advisor exactly as stated in Item 1A of Part I of Form ADV: Safran Wealth Advisors, LLC	IRS Empl. Ident. No.: 11-2786410
Item of Form (identify)	Answer	
Item 9.E cont.	<p>Advisor closely monitors transactions that could be considered insider trading. All employees' personal securities transaction records will be maintained separately and independently from that of clients.</p> <p>Code of Ethics</p> <p>The Advisor has adopted a Code of Ethics for the purpose of instructing its personnel in their ethical obligations and to provide rules for their personal securities transactions. The Advisor and its personnel owe a duty of loyalty, fairness and good faith towards their clients, and the obligation to adhere not only to the specific provisions of the Code but to the general principles that guide the Code.</p> <p>The Code covers a range of topics that may include: general ethical principles, reporting personal securities trading, exceptions to reporting securities trading, reportable securities, initial public offerings and private placements, reporting ethical violations, distribution of the Code, review and enforcement processes, amendments to Form ADV and supervisory procedures.</p> <p>The Advisor will provide a copy of the Code to any client or prospective client upon request.</p>	
Item 12.A & B	<p>Investment or Brokerage Discretion</p> <p>Under some circumstances associated persons of the Advisor may be granted the authority to select the amount of securities to be bought or sold without specific client consent.</p> <p>Clients may specify which broker-dealer to use or the Advisor may make recommendations. Generally, these recommendations are based on the Advisor's perception of the breadth of services offered, and quality of execution. However, the client may pay commissions or fees that are higher or lower than those that may be obtained from elsewhere for similar services. Clients are advised that they are under no obligation to act on the recommendations of the Advisor.</p>	
Item 13.A	<p>Additional Compensation</p> <p>Advisor has custodial and brokerage relations with Charles Schwab & Company, Inc. ("Schwab"), member FINRA/SIPC, through its Schwab Institutional services to financial advisors.</p> <p>Schwab provides on-line services for account administration and operational support, including electronic trading, account forms and applications, trading authorization, accounting and reporting, and other relevant administration and support services.</p> <p>Advisor has arrangements with Schwab to waive some charges for access based on total client assets under management. Such arrangements for the use of SchwabLink™ could be defined as "soft dollar" services.</p>	

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1.	Full name of Advisor exactly as stated in Item 1A of Part I of Form ADV: Safran Wealth Advisors, LLC	IRS Empl. Ident. No.: 11-2786410
Item of Form (identify)	Answer	
Item 13.A cont.	<p>The term "soft dollars" refers to the amount by which the commission paid by an investment manager <i>exceeds</i> the lowest commission rate available from other broker-dealers for basic execution services. The Advisor may use these "soft dollars," which are generated by its clients' trades, to pay for research and enhanced brokerage services that it receives from or through the broker-dealers whom it engages to do securities transactions. The products and services available from broker-dealers include internally-generated items such as in-house research, and services obtained by the broker-dealer through third parties (e.g. quotation equipment, etc.).</p> <p>Under the "safe harbor" afforded by Section 28(e) of the Securities Exchange Act of 1934, as amended, the Advisor's use of soft dollars generated by its clients' commissions to acquire research and brokerage" services is not a breach of the Advisor's fiduciary duties to its clients--even if the brokerage commissions paid are higher than the lowest available--as long as (among certain other requirements) the commissions being paid are reasonable in relation to the value of the brokerage services and the research services obtained. Section 28(e)'s "safe harbor" generally is not available where transactions are effected on a principal basis, with a markup or markdown paid to the broker-dealer, for transactions in futures and related futures interests, or for services or products that do not constitute research or brokerage services.</p> <p>Although many of the benefits and services the Advisor uses soft dollars to acquire are believed to be within Section 28(e)'s safe harbor provisions, the Advisor also expects to use soft dollars to pay for certain research and brokerage services that do not fall under the safe harbor provisions of Section 28(e). Payments of soft dollars outside the Section 28(e) safe harbor do not necessarily involve a breach of fiduciary duty.</p> <p>The Advisor believes the foregoing services benefit its clients, but they do not benefit clients exclusively. These benefits also are available to the Advisor in connection with transactions in which some or all of its clients may not participate.</p> <p>The availability of these services, and the Advisor's relationships with broker-dealers that provide soft dollar services influence the Advisor's selection of broker-dealers to provide services to its clients, and create conflicts of interest, both in allocating brokerage business between firms that provide soft dollar services and firms that do not, and in allocating the costs of mixed-use products between their research and non-research uses. These conflicts of interest are particularly influential to the extent that the Advisor uses soft dollars to pay expenses it would otherwise be required to pay itself.</p>	