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Client Brochure

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This brochure (“Brochure”) provides information about the qualifications and business practices of Clunator LLC (“Clunator”). If you have any questions about the contents of this Brochure, please contact us at (253) 254-6325 or support@clunator.com. Additional information about Clunator is also available on the SEC’s website at

www.adviserinfo.sec.gov.

Clunator is a Registered Investment Advisor. Registration does not imply a certain level of skill or training. It only indicates that Clunator has registered its business with state and federal regulatory authorities, including the United States Securities and Exchange Commission (SEC # 801-107559). The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.



Item 2: Material Changes Since Last Annual Update

Material Changes Not applicable. First Version of Brochure.



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Item 4: Advisory Business

A. Clunator Overview

Clunator is an investment advisory firm established to connect investors with investment advisors through an online web portal (“Portal”). Clunator is a privately held company headquartered in St. Louis, Missouri. Clunator was launched in March, 2016 by Dr. Pawan Jindal. Dr. Jindal owns 80% shares of Clunator. Additional information about Clunator is provided on Part 1 of Clunator’s Form ADV which is available online at <http://www.adviserinfo.sec.gov>. We also encourage visiting our website www.Clunator.com for additional information about our services.

B. Clunator’s Advisory Services

Clunator offers a unique online service to enable investors to manage their own investments by matching them with the right investment advisors. Individual advisor or an advisor group (“advisors”) sign up with Clunator to create one or more “Investment Profiles” on the online portal. Each profile is designed towards a particular investment objective and risk tolerance. The advisor is provided with a trading account attached to each profile. Every time an advisor submits a trade order, they are required to submit a detailed explanation for the particular trade. All orders submitted by the advisor along with the explanations are added to the advisor’s profile. Investors can review the profiles of advisors including all their prior trades and their explanations. This allows investors to review not only the returns generated by the advisor, but also understand the rationale behind each trade by the advisor.

After reviewing the profiles, the investors can “subscribe” to one or more advisors. The subscribed investors get real time alerts of all future trade orders submitted by the advisors. Investors can convert any of the alerts into a trade order and submit it as an order from their own trading account with a few clicks from Clunator’s web or mobile application.

Clunator provides a simple but powerful way for investors to evaluate and select investment advisors. With Clunator, the investor is always in control of their decisions.

C. Individualized Services and Investment Restrictions

Clunator tailors its software to recommend the best “Investment Profiles” to meet individual needs of investors. Investors are required to complete an objective set of questions regarding their investment objective, risk tolerance and some other questions at the time of creating an account. Based on the answers to the questions, clients are shown a list of Investment Profiles. Investment Profiles as described in the previous section are created by advisors. Investors can review the recommended profiles and select to subscribe to one or more of them.

D. Wrap Fee Programs

A wrap Fee Program is a professionally managed investment plan in which all expenses, including brokerage commissions, management fees, and administrative costs, are “wrapped” into a single charge for the investor. Clunator does NOT currently provide a wrap Fee Program.

E. Assets Under Management

Clunator does not manage any investor funds on discretionary or nondiscretionary basis. All investment decisions are made by the investors themselves.

Item 5 Fees and Compensation

A. Subscription Fees

Clunator does not charge any account maintenance fees to the investors for their account. Investors only pay the subscription fees for the “Investment Profiles” that they subscribe to. Every advisor sets up their own subscription fees for each “Investment Profile” created and managed by them. An advisor may offer trial periods or reduce or waive its fees for some investors. Subscription fees are charged on a monthly, quarterly or annual basis as decided by the advisor. The subscription fees have to be paid in advance at time of subscribing to the subscription. Investor can choose to cancel the subscription any time at the end of current billing period.

Clunator is compensated for its services by taking a commission on the subscription fee paid to the advisors. Clunator reserves the right, in its sole discretion, to negotiate, reduce or waive the fee for certain advisors for any period of time.

B. Brokerage Fees

Clunator allows investors to convert alerts from advisors into trade orders and submit them to a connected brokerage directly from Clunator application. Client will incur brokerage commissions for each order that gets executed. The current brokerage fee for each trade is \$3.99. Clunator reserves the right, in its sole discretion, to negotiate the brokerage fee for trades submitted directly through Clunator’s application. Clunator receives commission on the brokerage fee from brokerages for orders submitted through Clunator.

Investors can use any brokerages not connected or affiliated with Clunator for their trading.

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

Clunator does not charge performance-based fees. Our fees are only charged as disclosed above in Item 5.

Item 7 Types of Clients

Clunator is primarily designed for individual investors and investment clubs. There is no minimum amount required to open and maintain an investor account with Clunator. Investors have real-time access to their accounts through the online portal or a mobile application.

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

Clunator provides investors with the option to choose investment advisors while keeping them in control of their investment decisions. Clunator's goal is to enable those investors to make timely investments decisions who do not have the time and experience to find good investment opportunities themselves.

RISK CONSIDERATIONS

Investment in securities involves the possibility of financial loss that investors should be prepared to bear. Clunator cannot guarantee any level of performance or that any investor will avoid a loss of their assets. There is no guarantee that trade ideas posted by advisor's on Clunator will necessarily produce the intended results. Any advisor's judgment may prove to be incorrect, and an investor might not achieve her investment objectives. **Past performance of any advisor's results is no guarantee of future results, and any historical returns, expected returns, or probability projections may not reflect actual future performance.**

In addition, it is possible that investor or Clunator itself may experience computer equipment failure, loss of internet access, viruses, or other events that may impair investor access to Clunator's software to act in a timely manner. Clunator and its representatives are not responsible to any investor for losses unless caused by Clunator breaching its fiduciary duty.

Item 9 Disciplinary Information

Clunator is obligated to disclose any disciplinary event that might be material to any investor when evaluating our services. We do not have any material legal, financial, regulatory, or other "disciplinary" item to report to any Client. This statement applies to our firm and to every employee of our firm.

Item 10 Other Financial Industry Activities and Affiliations

Clunator utilizes Third Party brokerage companies to provide a simple way for investors to submit trade orders directly from Clunator application. As described above, Clunator receive a commission on the brokerage fee for the trades.

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

Clunator's has adopted a Code of Ethics that is consistent with the Code of Ethics requirements of Rule 204A-1 under the Investment Advisers Act of 1940. It includes general requirements that all employees and related persons comply with their fiduciary obligations to our investors and applicable securities laws, and specific requirements relating to, among other things, personal trading, insider trading, conflicts of interest, and confidentiality of client information.

Each new Clunator employee receives a copy of the Statement when hired by Clunator. A copy of the Code of Ethics will be made available to anyone upon request.

Clunator's employees and related persons may personally invest in securities recommended by advisor's on Clunator.

Item 12 Brokerage Practices

Clunator works with one or more independent brokerage companies to provides trade execution and clearing services integrated with Clunator software. Investors do not have to use the brokerage connected with Clunator for their trades. Clunator obtains information as to the general level of commission rates being charged by the brokerage community from time to time, and will periodically evaluate the overall reasonableness of brokerage commissions paid on transactions by reference to such data to ensure competitive commission rates. Clunator does *not* engage in any "soft dollar" practices involving the receipt of research or other brokerage service in relation to commission money, nor do we receive any research or other products in connection with investor's transactions.

Item 13 Review of Accounts

Clunator does not conduct any review of investor's accounts. All accounts are managed directly by the investors.

Item 14 Client Referrals and Other Compensation

Clunator expects from time to time to run promotional campaigns to attract new investors to open accounts through us. These promotions may include additional account services and/or reduced brokerage fees. Clunator may also pay pre-determined fees to third-parties for driving new users to Clunator. Clunator may engage solicitors and pay them for referrals. Clunator discloses this practice in writing to the affected investors and complies with the requirements of Rule 206(4)-3 under the Investment Advisers Act of 1940, as amended, to the extent required by applicable law.

Item 15 Custody

Clunator does not maintain custody of any Client funds or securities. The custody is maintained by the brokerage connected with Clunator. Each Client can review their account information, including trade confirmations and monthly account statements directly by logging into their Clunator account. Only the Broker's (or other third-party's) trading confirmations and statements represent the official records of an investor's Account.

Item 16 Investment Discretion

Clunator has no discretionary authority on the investor's accounts. Investors maintain full control to select the timing, size, and identity of securities to buy and sell for themselves.

Item 17 Voting Client Securities

Clunator does not vote on issues pertaining to client securities. In the event of a vote or proxy, the client will receive notice from the custodian of their account.

Item 18 Financial Information

This Item is not applicable because Clunator does not require or solicit the prepayment of any advisory fees, and does not have any adverse financial condition that is reasonably likely to impair our ability to continuously meet our contractual commitments to our Clients.