

## INTRODUCTION

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Our firm, Claraphi Advisory Network, LLC (“Claraphi”) is an investment advisor registered with the Securities and Exchange Commission. Brokerage and investment advisory services and fees differ, and it is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at [www.investor.gov/CRS](http://www.investor.gov/CRS), which also provides educational materials about investment advisors, broker-dealers, and investing.

## WHAT INVESTMENT SERVICES AND ADVICE CAN YOU PROVIDE ME?

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We offer investment advisory services to retail investors in the form of asset management and financial planning.

**Asset (Portfolio) Management:** We manage accounts on a discretionary and non-discretionary basis. Discretionary management means that after you sign an agreement with our firm, we are allowed to buy and sell investments in your account without asking you in advance. Any limitations on our discretionary authority will be described in the signed advisory agreement. We will have discretion until the advisory agreement is terminated. Non-discretionary management means we will contact you before a trading decision is implemented. We may delegate management of your account to one or more third party asset managers (“TPAM”). We also serve as co-fiduciaries and provide portfolio management services to the clients of other independent registered investment advisory firms. We will review your accounts at least annually. We require that clients have a \$25,000 minimum account balance, though we may waive or reduce this requirement in our sole discretion.

**Financial Planning:** We offer broad-based financial planning, including investment planning, retirement planning, estate needs, business needs, education planning, life and disability insurance needs, long-term care needs and cash flow/budget planning. We do not monitor your investments as part of our financial consulting service.

**Retirement Planning:** Claraphi provides retirement planning-related services, on a discretionary or non-discretionary basis separately or in combination with our other services. We may also serve as an ERISA 3(38) fiduciary. We monitor accounts on an ongoing basis, and review at least annually with the client.

*Additional information about our advisory services is located in Item 4 of our Firm Brochure which is available online at <https://adviserinfo.sec.gov/firm/summary/165868>.*

### **Conversation Starters:**

*Given my financial situation, should I choose an investment advisory service? Why or why not? How will you choose investments to recommend to me? What is your relevant experience, including your licenses, education and other qualifications? What do those qualifications mean?*

## WHAT FEES WILL I PAY?

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**Asset (Portfolio) Management:** Our portfolio management fee is charged monthly or quarterly in arrears at an annual rate of 2.0% or less for assets under management. Our fees vary and are negotiable. Separate and in addition to the advisory fee charged by Claraphi as outlined above, the TPAM will charge an annual percentage-based fee for their sub-advisory services of up to 2.00% *per annum*. The total of fees charged by Claraphi and the TPAM shall not exceed 3.0%.

**Financial Planning:** Hourly rates typically range between \$100 and \$800 per hour. Claraphi may also provide financial plans for a flat fee that typically ranges between \$2,000 and \$25,000, depending on the complexity of the plan, the expertise of the financial adviser, and the needs of the Client. Both hourly rates and flat fees are negotiable.

**Other Fees:** The advisory fees and transaction charges do not cover charges imposed by third parties for investments held in the account, such as contingent deferred sales charges or 12(b)-1 trails on mutual funds. In addition, each mutual fund or third-party investment manager charges asset management fees, which are separate from, and in addition to, the Firm's advisory fees. The fees charged by such funds or managers are disclosed in each fund's prospectus or Manager's ADV Part 2A. Third-parties may require a minimum advisory fee or quarterly maintenance fee that will be detailed in the applicable Investment Management Agreement. Claraphi's advisory fee also does not cover fees and charges in connection with: debit balances; margin interest; odd-lot differentials; IRA fees; transfer taxes; exchange fees; wire transfers; extensions; non-sufficient funds; mailgrams; legal transfers; bank wires; postage; costs associated with exchanging foreign currencies; and SEC fees or other fees or taxes required by law. In certain cases, we may select third party asset managers to manage your account. If selected, they will charge you an additional management fee, which will be outlined in their separate advisory agreement.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

*Additional information about our fees is located in Item 5 of our Firm Brochure, which is available online at <https://adviserinfo.sec.gov/firm/summary/165868>.*

**Conversation Starters:**

*Help me understand how these fees and costs may affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs and how much will be invested for me?*

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**WHAT ARE YOUR LEGAL OBLIGATIONS TO ME WHEN ACTING AS MY INVESTMENT ADVISOR? HOW ELSE DOES YOUR FIRM MAKE MONEY AND WHAT CONFLICTS OF INTEREST DO YOU HAVE?**

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*When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice, we provide you.*

Here are some examples to help you understand what this means:

- Some of our financial professionals are also insurance agents who sell insurance products or brokers who conduct transaction-based services for a commission. These individuals have an incentive to recommend insurance or brokerage products to you to increase their compensation.
- We may utilize third party sub-advisors to manage a part or all of your portfolio. In these cases, you may pay additional fees for the use of the third-party sub-advisor.

**Conversation Starters:**

*How might your conflicts of interest affect me, and how will you address them?*

*Additional information about our conflicts of interest is located in Item 10 and 12 of our Firm Brochure, which is available online at <https://adviserinfo.sec.gov/firm/summary/165868>.*

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**HOW DO YOUR FINANCIAL PROFESSIONALS MAKE MONEY?**

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Our financial professionals are compensated based on the revenue our firm earns from their advisory services or recommendations, the amount of client assets they service, and the time and complexity required to meet a client's needs.

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**DO YOU OR YOUR FINANCIAL PROFESSIONALS HAVE LEGAL OR DISCIPLINARY HISTORY?**

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Our CEO, Kathleen McPherson, has two customer dispute disclosures and two regulatory disclosures, related to failures to supervise and implementing written supervisory procedures. For more details on these disclosures, please visit [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) and search by CRD number 1526361.

*Visit [Investor.gov](http://Investor.gov)/CRS for a free and simple search tool to research our firm and our financial professionals.*

**Conversation Starters:**

*As a financial professional, do you have any disciplinary history? For what type of conduct?*

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**ADDITIONAL INFORMATION**

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You can find additional information about our firm's investment advisory services on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching CRD #165868. You may also contact our firm at 949-215-0025 to request a copy of this relationship summary and other up-to-date information.

**Conversation Starters:**

*Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?*