

UNITED STATES SECURITIES AND EXCHANGE COMMISSION WASHINGTON, D.C. 20549

January 12, 2011

Warren B. Kanders, Principal Executive Officer Clarus Corporation 2084 EAST, 3900 South Salt Lake City, OR 84124

Re: Clarus Corporation

Form 10-K for Fiscal Year Ended December 31, 2009

File No.: 0-24277

Dear Mr. Kanders:

We have completed our review of your Form 10-K for Fiscal Year Ended December 31, 2009 and have no further comments at this time.

Sincerely, John Reynolds

Assistant Director Office of Beverages, Apparel and Health Care Services

cc: Robert Lawrence

Via facsimile to (212) 245-3009