

**Firm Brochure**  
(Part 2A of Form ADV)



**Luke Financial Company, LLC**  
**6860 N Dallas Parkway**  
**Suite 200**  
**Plano, TX 75024**

**PHONE: 972-265-7990**

**FAX: 866-340-5716**

**WEBSITE: [lukefinancial.com](http://lukefinancial.com)**

**EMAIL: [jonathan@lukefinancial.com](mailto:jonathan@lukefinancial.com)**

This brochure provides information about the qualifications and business practices of Luke Financial Company, LLC. Being registered as a registered investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at 972-265-7990 or by email at [jonathan@lukefinancial.com](mailto:jonathan@lukefinancial.com). 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.

Additional information about Luke Financial Company, LLC is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

June 13, 2016

## **Item 2: Material Changes**

---

### **Annual Update**

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure.

---

### **Material Changes since the Last Update**

This update is in accordance with the required annual update for Registered Investment Advisors. Since the last update on February 3, 2015, the following changes have been made:

- The cover page has been updated to disclose our new address and phone number.
  - Item 4 has been updated to disclose the current calculation for client assets under management.
- 

### **Full Brochure Available**

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at 972-265-7990 or by email at [jonathan@lukefinancial.com](mailto:jonathan@lukefinancial.com).

**Item 3: Table of Contents**  
**Form ADV – Part 2A – Firm Brochure**

**Item 1: Cover Page**

**Item 2: Material Changes** ..... **i**

    Annual Update..... i

    Material Changes since the Last Update ..... i

    Full Brochure Available ..... i

**Item 3: Table of Contents**..... **ii**

**Item 4: Advisory Business**..... **1**

    Firm Description ..... 1

    Types of Advisory Services ..... 1

    Client Tailored Services and Client Imposed Restrictions ..... 2

    Wrap Fee Programs ..... 2

    Client Assets under Management ..... 2

**Item 5: Fees and Compensation** ..... **3**

    Method of Compensation and Fee Schedule..... 3

    Client Payment of Fees..... 3

    Additional Client Fees Charged ..... 4

    Prepayment of Client Fees..... 4

    External Compensation for the Sale of Securities to Clients ..... 4

**Item 6: Performance-Based Fees**..... **4**

    Sharing of Capital Gains..... 4

**Item 7: Types of Clients** ..... **4**

    Description ..... 4

    Account Minimums ..... 5

**Item 8: Methods of Analysis, Investment Strategies and Risk of Loss** ..... **5**

    Methods of Analysis ..... 5

    Investment Strategy..... 5

    Security Specific Material Risks ..... 5

<b>Item 9: Disciplinary Information.....</b>	<b>6</b>
Criminal or Civil Actions .....	6
Administrative Enforcement Proceedings.....	6
Self-Regulatory Organization Enforcement Proceedings.....	6
<b>Item 10: Other Financial Industry Activities and Affiliations .....</b>	<b>6</b>
Broker-Dealer or Representative Registration .....	6
Futures or Commodity Registration.....	7
Material Relationships Maintained by this Advisory Business and Conflicts of Interest ..	7
Recommendations or Selections of Other Investment Advisors and Conflicts of Interest	7
<b>Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading .....</b>	<b>7</b>
Code of Ethics Description .....	7
Investment Recommendations Involving a Material Financial Interest and Conflict of Interest.....	8
Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest.....	8
Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest.....	8
<b>Item 12: Brokerage Practices .....</b>	<b>8</b>
Factors Used to Select Broker-Dealers for Client Transactions.....	8
Aggregating Securities Transactions for Client Accounts .....	9
<b>Item 13: Review of Accounts .....</b>	<b>9</b>
Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved.....	9
Review of Client Accounts on Non-Periodic Basis .....	9
Content of Client Provided Reports and Frequency.....	9
<b>Item 14: Client Referrals and Other Compensation.....</b>	<b>9</b>
Economic Benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest.....	9
Advisory Firm Payments for Client Referrals .....	9
<b>Item 15: Custody.....</b>	<b>10</b>
Account Statements .....	10

<b>Item 16: Investment Discretion .....</b>	<b>10</b>
Discretionary Authority for Trading .....	10
<b>Item 17: Voting Client Securities .....</b>	<b>10</b>
Proxy Votes .....	10
<b>Item 18: Financial Information .....</b>	<b>10</b>
Balance Sheet.....	10
Financial Conditions Reasonably Likely to Impair Advisory Firm’s Ability to Meet Commitments to Clients.....	10
Bankruptcy Petitions During the Past Ten Years .....	10
<b>Item 19: Requirements for State Registered Advisors .....</b>	<b>11</b>
<b>Supervised Person Brochure - Part 2B of Form ADV .....</b>	<b>12</b>
Jonathan Frank Mazur.....	12
Principal Executive Officers and Management Persons .....	13
Education and Business Standards .....	13
Disciplinary Information.....	13
Other Business Activities .....	13
Additional Compensation .....	13
Supervision.....	13
Requirements for State-Registered Advisors .....	13

## **Item 4: Advisory Business**

---

### **Firm Description**

Luke Financial Company, LLC (“LFC”) was founded in 2007. Jonathan Mazur is Managing Member.

LFC provides personalized confidential financial planning and investment management to individuals, pension and profit sharing plans, trusts, estates, and charitable organizations. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, and estate planning.

LFC is a fee-based financial planning and investment management firm. The firm does not sell annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products. The firm’s Managing Member is affiliated with entities that sell financial insurance products and securities products.

LFC does not act as a custodian of client assets.

A detailed analysis is reviewed on each client’s initial situation, which includes a risk questionnaire designed to measure each individual’s propensity for investment risk. Periodic reviews are also held to provide reevaluate and reinforce specific courses of action that need to be taken. More frequent reviews by the advisor occur but are not necessarily communicated to the client.

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly by the client on an as-needed basis. Conflicts of interest will be disclosed to the client in the unlikely event they should occur.

---

### **Types of Advisory Services**

LFC provides investment supervisory services, also known as asset management services and furnishes financial planning and investment advice through consultations.

#### ASSET MANAGEMENT

LFC offers discretionary direct asset management services to advisory clients. LFC will offer clients ongoing portfolio management services through determining individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, asset allocation, portfolio monitoring and the overall investment program will be based on the above factors. The client will authorize LFC discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement.

#### FINANCIAL PLANNING and CONSULTING

If financial planning services are applicable, the client will compensate LFC on an hourly or fixed fee basis described in detail under the “Fees and Compensation” section of this brochure. If the client elects to act on any of the recommendations, the client is under no obligation to effect the transaction through LFC. Clients may terminate advisory services with thirty (30) days written notice. All services are completed inside of six (6) months.

LFC also provides advice in the form of a financial plan. In general, the financial plan will address any or all of the following areas of concern:

**PERSONAL:** Family records, budgeting, personal liability, estate information and financial goals.

**CASH FLOW:** Income tax and spending analysis and planning for past, current and future years. LFC will illustrate the impact of various investments on a client's current income and future tax liability.

**DEATH & DISABILITY:** Cash needs at death, income needs of surviving dependents, estate planning and disability income analysis.

**RETIREMENT:** Analysis of current strategies and investment plans to help the client achieve his/her retirement goals.

**INVESTMENTS:** Analysis of investment alternatives and their effect on a client's portfolio.

LFC gathers required information through in-depth personal interviews. Information gathered includes a client's current financial status, future goals and attitudes towards risk. Related documents supplied by the client are carefully reviewed. Should a client choose to implement the recommendations contained in the plan, LFC suggests the client work closely with his or her attorney, accountant, and/or insurance agent, and/or stockbroker. Implementation of financial plan recommendations is entirely at the client's discretion. Financial Planning recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company. In performing its services, LFC shall not be required to verify any information received from the client or from the client's other professionals and is expressly authorized to rely thereon. If requested by the client, LFC may recommend the services of other professionals for implementation services. The client is under no obligation to engage the services of any such recommended professional.

#### SEMINARS AND WORKSHOPS

LFC holds seminars and workshops to educate the public on different types of investments and the different services they offer. The seminars are educational in nature and no specific investment or tax advice is given. LFC may charge a fee for attendance to these seminars.

#### CONSULTING

Clients can receive investment advice on isolated area(s) of concern such as estate planning, retirement planning, review of a client's existing portfolio, or any other specific topic. LFC also provides specific consultation and administrative services regarding investment/financial concerns of the client.

---

### **Client Tailored Services and Client Imposed Restrictions**

The goals and objectives for each client are documented in our client files. Investment strategies are created that reflect the stated goals and objective(s). Clients may impose restrictions on investing in certain securities or types of securities. Agreements may not be assigned without client consent.

---

### **Wrap Fee Programs**

LFC no longer sponsors a wrap fee program.

---

### **Client Assets under Management**

As of June 2, 2016, LFC managed approximately \$29.6 million of assets on a discretionary basis and \$0 on a non-discretionary basis.

## Item 5: Fees and Compensation

---

### Method of Compensation and Fee Schedule

LFC bases its fees on a percentage of assets under management, hourly fees, and fixed fees.

#### ASSET MANAGEMENT

LFC offers discretionary, direct asset management services to advisory clients. Fees for these services will be based on a percentage of Assets Under Management as follows:

<b>Assets Under Management</b>	<b>Annual Fee</b>	<b>Quarterly Fee</b>
Up to \$500,000	1.80%	.45%
\$500,001 - \$1,000,000	1.60%	.40%
\$1,000,001 - \$2,000,000	1.25%	.3125%
\$2,000,001 - \$5,000,000	1.00%	.25%
Over \$5,000,001	negotiable	negotiable

In certain circumstances, the annual fee may be negotiable. Accounts within the same household may be combined for a reduced fee. Fees are billed quarterly in arrears based on the amount of assets to be managed as of the close of business on the last business day of each quarter. Quarterly advisory fees deducted from the clients account by the custodian will be reflected on a provided fee invoice as fees are withdrawn. Clients may terminate their account for a full refund within five (5) business days of signing the Investment Advisory Contract. Either party may terminate advisory services with thirty (30) days written notice. Client may cancel the agreement without penalty within five (5) business days of entering into the agreement. LFC will be entitled to a pro rata fee for the days that service was provided in the final quarter. Client shall be given thirty (30) days prior written notice of any increase in fees.

#### FINANCIAL PLANNING and CONSULTING

LFC charges either a negotiable fixed fee or an hourly fee for financial planning. Prior to the planning process the client will be provided an estimated plan fee. Payment is due upon commencement of the plan. Client may cancel the agreement without penalty within five (5) business days of entering into the agreement. If client cancels after five (5) business days they will be entitled to a refund for any unearned fees.

#### **FIXED FEES**

Financial Planning Services are offered based on a negotiable, fixed fee ranging from \$250 to \$10,000, depending on the nature and complexity of each client's circumstances.

#### **HOURLY FEES**

Financial Planning Services are offered based on an hourly fee of \$250 per hour based on complexity and unique client needs.

#### SEMINARS AND WORKSHOPS

For fixed fee seminars, one half of this fee may be due in advance, with the balance due upon completion of the seminar. For seminar participants, the fee will be paid prior to attendance.

---

### Client Payment of Fees

Investment management fees are payable quarterly in arrears. Clients receive account billing statements within twenty (20) days of the end of a quarter. Fees are usually

deducted from a designated client account to facilitate billing. The client must consent in advance to direct debiting of their investment account. Clients have the option to pay investment management fees directly.

Fees for financial plans are due 100% at commencement of the plan.

For fixed fee seminars, one half of this fee may be due in advance, with the balance due upon completion of the seminar. For seminar participants, the fee will be paid prior to attendance.

---

### **Additional Client Fees Charged**

Custodians may charge transaction fees on purchases or sales of certain mutual funds, equities and exchange-traded funds. These charges may include mutual fund transactions fees, postage and handling and miscellaneous fees (fee levied to recover costs associated with fees assessed by self-regulatory organizations). These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

LFC, in its sole discretion, may waive its minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.).

For more details on the brokerage practices, see Item 12 of this brochure.

---

### **Prepayment of Client Fees**

Fees for financial planning are due 100% upon commencement of the plan.

For fixed fee seminars, one half of this fee may be due in advance, with the balance due upon completion of the seminar. For seminar participants, the fee will be paid prior to attendance.

---

### **External Compensation for the Sale of Securities to Clients**

LFC does not receive any external compensation for the sale of securities to clients, nor do any of the investment advisor representatives of LFC.

---

## **Item 6: Performance-Based Fees**

### **Sharing of Capital Gains**

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

LFC does not use a performance-based fee structure because of the conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

---

## **Item 7: Types of Clients**

### **Description**

LFC generally provides investment advice to individuals, trusts, estates, charitable organizations, corporations or business entities.

Client relationships vary in scope and length of service.

---

### **Account Minimums**

Accounts managed by LFC do not require a minimum to open an account.

## **Item 8: Methods of Analysis, Investment Strategies and Risk of Loss**

---

### **Methods of Analysis**

Security analysis methods may include charting, fundamental analysis, technical analysis, and cyclical analysis. Investing in securities involves risk of loss. Past performance is not a guarantee of future returns.

Fundamental analysis involves evaluating a stock using real data such as company revenues, earnings, return on equity, and profits margins to determine underlying value and potential growth. Technical analysis involves evaluating securities based on past prices and volume. Cyclical analysis involves analyzing the cycles of the market.

The main sources of information include financial newspapers and magazines, inspection of corporate activities, research materials prepared by others, corporate rating services, timing services, annual reports, prospectuses, filings with the Securities and Exchange Commission and company press releases.

---

### **Investment Strategy**

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time. Each client executes an Investment Policy Statement, Risk Tolerance or a similar form that documents his objectives and desired investment strategy.

Other strategies may include long-term purchases, short-term purchases, trading, margin transactions and option writing (including covered options, uncovered options or spreading strategies).

---

### **Security Specific Material Risks**

Fundamental analysis may involve interest rate risk, market risk, business risk, and financial risk. Risks involved in technical analysis are inflation risk, reinvestment risk, and market risk. Cyclical analysis involves inflation risk, market risk, and currency risk.

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- *Interest-rate Risk:* Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- *Market Risk:* The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.

- *Inflation Risk*: Inflation decreases the value of money, affecting purchasing power. The value of money is decreased with inflation whether the money is invested or not.
- *Currency Risk*: Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as *exchange rate risk*.
- *Reinvestment Risk*: This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- *Business Risk*: These risks are associated with a particular industry or a particular company within an industry. For example, automobile manufacturers rely on a steady stream of new car purchases. In a bad economy, purchases decrease and profitability is affected. They carry a higher risk of profitability than an electric company which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- *Liquidity Risk*: Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- *Financial Risk*: Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

## **Item 9: Disciplinary Information**

---

### **Criminal or Civil Actions**

The firm and its management have not been involved in any criminal or civil action.

### **Administrative Enforcement Proceedings**

The firm and its management have not been involved in administrative enforcement proceedings.

### **Self-Regulatory Organization Enforcement Proceedings**

The firm and its management have not been involved in legal or disciplinary events related to past or present investment clients.

## **Item 10: Other Financial Industry Activities and Affiliations**

---

### **Broker-Dealer or Representative Registration**

LFC is not a broker/dealer and none of its employees are registered representatives of a broker/dealer.

---

**Futures or Commodity Registration**

Neither LFC nor its employees are registered or has an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

---

**Material Relationships Maintained by this Advisory Business and Conflicts of Interest**

Managing Member Jonathan Mazur is licensed as an insurance agent. Greater than 50% of Mr. Mazur's time is spent in his insurance practice. From time to time, he will offer clients advice or products from those activities.

These practices represent conflicts of interest because it gives Mr. Mazur an incentive to recommend products based on the commission amount received. This conflict is mitigated by the fact that Mr. Mazur has a fiduciary responsibility to place the best interest of the client first and clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent of their choosing.

---

**Recommendations or Selections of Other Investment Advisors and Conflicts of Interest**

LFC does not utilize the services of Third Party Money Managers to manage client accounts.

---

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

---

**Code of Ethics Description**

The employees of LFC have committed to a Code of Ethics ("Code"). The purpose of our Code is to set forth standards of conduct expected of LFC employees and addresses conflicts that may arise. The Code defines acceptable behavior for employees of LFC. The Code reflects LFC and its supervised persons' responsibility to act in the best interest of their client.

One area which the Code addresses is when employees buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our clients. We do not allow any employees to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our clients.

LFC's policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other employee, officer or director of LFC may recommend any transaction in a security or its derivative to advisory clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

LFC's Code is based on the guiding principle that the interests of the client are our top priority. LFC's officers, directors, advisors, and other employees have a fiduciary duty to our clients and must diligently perform that duty to maintain the complete trust and confidence of our clients. When a conflict arises, it is our obligation to put the client's interests over the interests of either employees or the company.

The Code applies to "access" persons. "Access" persons are employees who have access to non-public information regarding any clients' purchase or sale of securities, or non-public information regarding the portfolio holdings of any reportable fund, who are involved in making securities recommendations to clients, or who have access to such recommendations that are non-public.

The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

---

**Investment Recommendations Involving a Material Financial Interest and Conflict of Interest**

LFC and its employees do not recommend to clients securities in which they have a material financial interest.

---

**Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest**

LFC and its employees may buy or sell securities that are also held by clients. In order to mitigate conflicts of interest such as executing their trades in advance of clients' trades, employees are required to disclose all reportable securities transactions as well as provide LFC with copies of their brokerage statements.

The Chief Compliance Officer of LFC is Jonathan Mazur. He reviews all employee trades each quarter. The personal trading reviews ensure that the personal trading of employees does not affect the markets and that clients of the firm receive preferential treatment over employee transactions.

---

**Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest**

LFC does not maintain a firm proprietary trading account and does not have a material financial interest in any securities being recommended; therefore, no conflicts of interest exist.

---

**Item 12: Brokerage Practices**

---

**Factors Used to Select Broker-Dealers for Client Transactions**

LFC may recommend the use of a particular broker-dealer or may utilize a broker-dealer of the client's choosing. LFC will select appropriate brokers based on a number of factors including but not limited to their relatively low transaction fees and reporting ability. LFC relies on its custodian to provide its execution services at the best prices available. Lower fees for comparable services may be available from other sources. Clients pay for any and all custodial fees in addition to the advisory fee charged by LFC.

- *Directed Brokerage*

In circumstances where a client directs LFC to use a certain broker-dealer, LFC still has a fiduciary duty to its clients. The following may apply with Directed Brokerage: LFC's inability to negotiate commissions, to obtain volume discounts, to charge commissions uniformly among clients and conflicts of interest arising from brokerage firm referrals.

- *Best Execution*

Investment advisors who manage or supervise client portfolios on a discretionary basis have a fiduciary obligation of best execution. The determination of what may constitute best execution and price in the execution of a securities transaction by a broker involves a number of considerations and is subjective. Factors affecting brokerage selection include the overall direct net economic result to the portfolios, the efficiency with which the transaction is effected, the ability to effect the

transaction where a large block is involved, the operational facilities of the broker-dealer, the value of an ongoing relationship with such broker and the financial strength and stability of the broker. The firm does not receive any portion of the trading fees. LFC reviews the execution of trades at each custodian each quarter.

- *Soft Dollar Arrangements*

LFC utilizes the services of custodial broker dealers. Economic benefits are received by LFC which would not be received if LFC did not give investment advice to clients. These benefits include: a dedicated trading desk, a dedicated service group and an account services manager dedicated to LFC's accounts, the ability to conduct "block" client trades, to download trades electronically, to review client balances and positions and the capability to duplicate or group client statements. It also includes the ability to have advisory fees directly deducted from client accounts.

A conflict of interest exists when LFC receives soft dollars. This conflict is mitigated by the fact that Mr. Mazur has a fiduciary responsibility to act in the best interest of his clients and the services received are beneficial to all clients.

---

### **Aggregating Securities Transactions for Client Accounts**

LFC is authorized in its discretion to aggregate purchases and sales and other transactions made for the account with purchases and sales and transactions in the same securities for other clients of LFC. All clients participating in the aggregated order shall receive an average share price with all other transaction costs shared on a pro-rata basis.

## **Item 13: Review of Accounts**

---

### **Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved**

Account reviews are performed quarterly by Jonathan Mazur, Chief Compliance Officer. Account reviews are performed more frequently when market conditions dictate. Financial Plans are considered complete when recommendations are delivered to the client and a review is done only upon request of the client.

---

### **Review of Client Accounts on Non-Periodic Basis**

Other conditions that may trigger a review of client accounts are changes in the tax laws, new investment information and changes in a client's own situation.

---

### **Content of Client Provided Reports and Frequency**

Clients receive written account statements no less than quarterly for managed accounts. Account statements are issued by the Advisor's custodian. Clients will receive confirmations of each transaction in their account from the Custodian and a statement during any month in which a transaction occurs.

## **Item 14: Client Referrals and Other Compensation**

---

### **Economic Benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest**

LFC does not receive any economic benefits from external sources.

---

### **Advisory Firm Payments for Client Referrals**

LFC does not compensate for client referrals.

## **Item 15: Custody**

---

### **Account Statements**

All assets are held at qualified custodians, which means the custodians provide account statements directly to clients at their address of record at least quarterly. Clients are urged to compare the account statements received directly from their custodians to the performance report statements prepared by LFC.

LFC is deemed to have indirect custody solely because advisory fees are directly deducted from client's account by the custodian on behalf of LFC.

## **Item 16: Investment Discretion**

---

### **Discretionary Authority for Trading**

LFC accepts discretionary authority to manage securities accounts on behalf of clients. LFC has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold.

The client approves the custodian to be used and the commission rates paid to the custodian. LFC does not receive any portion of the transaction fees or commissions paid by the client to the custodian on certain trades.

## **Item 17: Voting Client Securities**

---

### **Proxy Votes**

LFC does not vote proxies on securities. Clients are expected to vote their own proxies. The client will receive their proxies directly from the custodian of their account or from a transfer agent.

When assistance on voting proxies is requested, LFC will provide recommendations to the client. If a conflict of interest exists, it will be disclosed to the client.

## **Item 18: Financial Information**

---

### **Balance Sheet**

A balance sheet is not required to be provided because LFC does not serve as a custodian for client funds or securities and LFC does not require prepayment of fees of more than \$500 per client six months or more in advance.

### **Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients**

LFC has no condition that is reasonably likely to impair our ability to meet contractual commitments to our clients.

### **Bankruptcy Petitions During the Past Ten Years**

Neither LFC nor its management has had any bankruptcy petitions in the last ten years.

**Item 19: Requirements for State Registered Advisors**

**Education and business background, including any outside business activities and disclosable events for all management and supervised persons can be found in the Supplement to this Brochure (part 2B of Form Adv Part 2).**

**Material Relationship Maintained by this Advisory Business or Management persons with Issuers of Securities**

None to report

**Supervised Person Brochure - Part 2B of Form ADV**

---

**Jonathan Frank Mazur**

**Luke Financial Company, LLC  
6860 N Dallas Parkway, Suite 200  
Plano, TX 75024**

**PHONE: 972-265-7990**

**FAX: 866-340-5716**

**WEBSITE: [lukefinancial.com](http://lukefinancial.com)**

**EMAIL: [jonathan@lukefinancial.com](mailto:jonathan@lukefinancial.com)**

This brochure supplement provides information about Jonathan Mazur that supplements the Luke Financial Company, LLC's brochure. You should have received a copy of that brochure. Please contact Jonathan Mazur if you did not receive Luke Financial Company, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Jonathan Mazur is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

June 13, 2016

## Brochure Supplement (Part 2B of Form ADV)

### Supervised Person Brochure

---

#### Principal Executive Officers and Management Persons

Jonathan Frank Mazur CRD# 5025791

- Date of Birth: 11/02/1961
- 

#### Education and Business Standards

##### *Educational Background:*

- Antioch College – Bachelor of Arts – 1983
- Baylor University – Masters of Business Administration - 1987

##### *Business Experience:*

- Luke Financial Company, LLC - Managing Member/IAR - 02/2008 - Present
  - Zachary Financial, LLC - Owner/Insurance Agent - 02/2008 – Present
  - Fox Financial Management Corp – Registered Representative – 07/2011 – 05/2012
  - Jungletrek – Owner – 4/2002 – 12/2009
  - Fox Financial Management – Financial Advisor – 08/2008 – 07/2009
  - Brookstone Capital Management LLC – IAR – 11/2006 – 07/2008
  - Luke Financial – President – 10/2004 – 02/2008
  - Princor Financial Services Corp – Registered Representative – 08/2005 – 10/2006
  - Principal Life Insurance Co – Agent – 08/2005 – 10/2006
  - Lucas Group – Executive Senior Partner – 03/1991 – 03/2002
- 

#### Disciplinary Information

None to report

---

#### Other Business Activities

Jonathan Mazur has financial industry affiliated businesses as an insurance agent (license # 1296812). From time to time, he offers clients advice or products from those activities. Clients are not required to purchase any products.

This represents a conflict of interest because it gives an incentive to recommend products and services based on the commission and/or fee amount received. This conflict is mitigated by the fact that Mr. Mazur has a fiduciary responsibility to place the best interest of the client first and clients are not required to purchase any products or services. Clients have the option to purchase these products or services through another financial professional of their choosing.

---

#### Additional Compensation

Mr. Mazur receives commissions for the sale of insurance products through his affiliated company, Zachary Financial, LLC. He does not receive any performance based fees.

---

#### Supervision

Since Mr. Mazur is the sole owner of Luke Financial Company, LLC, he is solely responsible for all supervision and formulation and monitoring of investment advice offered to clients. He adheres to the policies and procedures as described in the firm's Compliance Manual.

---

#### Requirements for State-Registered Advisors

*Arbitration Claims:* None

*Self-Regulatory Organization or Administrative Proceeding:* None

*Bankruptcy Petition:* None

---