

Firm Brochure
(Part 2A of Form ADV)



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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. 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 (CRD# 147118) is available on the SEC's website at www.adviserinfo.sec.gov

March 2, 2020

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 March 6, 2019, the following changes have been made:

- Assets under management have been updated in Item 4.
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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.

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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 services. 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.

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

ASSET MANAGEMENT

LFC requires 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 investment transactions as stated within the Investment Advisory Agreement.

FINANCIAL PLANNING AND CONSULTING

For Clients wishing to engage the firm for financial planning services, the Client will compensate LFC on an hourly or fixed fee basis described in detail under the “Fees and Compensation” section of this brochure. Clients may terminate advisory services with thirty (30) days written notice. All Financial Planning services are completed inside of six (6) months. In a Financial Plan, LFC may recommend that the Client engage LFC as their asset manager and this generate additional revenue for LFC. This conflict is mitigated by disclosures, LFCs adherence to its procedures, and its Fiduciary duty to act in the client’s best interest. If the Client elects to act on any of the recommendations, the Client always has the right to decide whether to effect the transaction through LFC.

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 custodian 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. Client always has the right to decide whether to engage the services of any such recommended professional.

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.

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 prior written Client consent.

Wrap Fee Programs

LFC no longer sponsors a wrap fee program.

Client Assets under Management

As of December 31, 2019, LFC managed approximately \$17,100,000 of assets on a discretionary basis and \$0 on a non-discretionary basis.

Item 5: Fees and Compensation

Method of Compensation and Fee Schedule

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:

| Assets Under Management | Annual Fee | Quarterly Fee |
|--------------------------------|-------------------|----------------------|
| 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 will be combined for a reduced fee unless otherwise requested by the Client. 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 without fee or penalty within five (5) business days of signing the Investment Advisory Contract. After five (5) days, either party may terminate advisory services with thirty (30) days written notice. LFC will be entitled to a pro rata fee for the days that service was provided in the final quarter. Client will execute a new agreement in the event of any increase of fees.

For Client located in Colorado and LFS is authorized or permitted to deduct fees directly from the account by the custodian:

- LFS will provide the Client with an invoice concurrent to instructing the custodian to deduct the fee stating the amount of the fee, the formula used to calculate the fee, the amount of assets under management the fee is based on and the time period covered by the fee;
- LFS will obtain written authorization signed by the Client allowing the fees to be deducted; and
- The Client will receive quarterly statements directly from the custodian which disclose the fees deducted.

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 delivery of the plan or consulting services. 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

Seminar participants will pay the fee 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 delivery of the plan or consulting services.

Seminar participants will pay the fee 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 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

Seminar participants will pay the fee 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. LFC and their affiliated persons may be insurance licensed and receive additional fees, please see Item 10 for more information.

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 and therefore LFC does not engage in side-by-side management.

Item 7: Types of Clients

Description

LFC generally provides investment advice to individuals and high net worth individuals. 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, and covered option writing.

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.
- *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.
- *Short-term purchases:* Short-term investments are typically held for one year or less. Generally there is not a high expectation for a return or an increase in value. Typically, short-term investments are purchased for the relatively greater degree of principal protection they are designed to provide.
- *Covered Options Writing:* The risks involved with options are that they are very time sensitive investments. The duration of an options contract is generally a few months. The risk of writing a covered option is that it requires the client to sell the position at the strike price if the option is exercised and that strike price may be significantly lower than the then current market price of the security against which the option was written.

Item 9: Disciplinary Information

Criminal or Civil Actions

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

Administrative Enforcement Proceedings

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

Self-Regulatory Organization Enforcement Proceedings

LFC 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 disclosures, LFC's adherence to its procedures, and its Fiduciary obligation to act in the client's best interest. The client always has the right to decide whether to act upon an insurance recommendation made by LFC. Should they decide to act on the recommendation, the client always has the right to purchase insurance through any 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.

LFC 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 front run or disadvantage the trading for Clients.

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 requires the use of a particular custodian, Raymond James. 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*
LFC does not allow directed brokerage accounts.
- *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 custodian, 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 custody accounts with the custodian. 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 because LFC receives soft dollars. This conflict is mitigated by disclosures, LFCs adherence to its procedures, and the firm's Fiduciary duty to act in the best interest of its Clients.

Aggregating Securities Transactions for Client Accounts

LFC is authorized in its discretion to aggregate purchases and sales made for the account with purchases and sales in the same securities for other Clients of LFC. All Clients participating in the aggregated order shall receive an average share price.

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. LFC will, at least annually, engage the Client to review their profile, changes in status (i.e. Martial, Family, Income), and other factors that may affect their investment goals and objectives.

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 Client'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. Please see Item 5 for more information on direct deduction.

Item 16: Investment Discretion

Discretionary Authority for Trading

LFC requires 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 engages the custodian to be used and understands and accepts that the custodian will charge commissions for the execution of certain types of securities transactions. 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, the Client may contact LFC with any questions. 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

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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.

March 2, 2020

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
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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

Managing Member Jonathan Mazur is licensed as an insurance agent (License # 1296812). 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 disclosures, procedures, and the firm's Fiduciary obligation to place the best interest of the Client first and Clients are not required to purchase any products. Client always has the right to decide whether to purchase these products through another insurance agent or agency 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 to report.

Self-Regulatory Organization or Administrative Proceeding: None to report.

Bankruptcy Petition: None to report.