

**FORM ADV****Uniform Application for Investment Adviser Registration****Part II - Page 1**

## OMB APPROVAL

OMB Number: 3235-0049

Expires: August 31, 2012

Estimated average burden

hours per response . . . . . 4.32

Name of Investment Adviser:

**Raymond J. Lucia Companies, Inc.**

Address: (Number and Street)

(City)

(State)

(Zip Code)

Area Code: Telephone Number:

**13520 Evening Creek Drive, North****San Diego****CA****92128****619 497-5555**

**This part of Form ADV gives information about the investment adviser and its business for the use of clients.  
The information has not been approved or verified by any governmental authority.**

**Table of Contents**

<b><u>Item Number</u></b>	<b><u>Item</u></b>	<b><u>Page</u></b>
1	Advisory Services and Fees . . . . .	2
2	Types of Clients . . . . .	2
3	Types of Investments . . . . .	3
4	Methods of Analysis, Sources of Information and Investment Strategies . . . . .	3
5	Education and Business Standards . . . . .	4
6	Education and Business Background . . . . .	4
7	Other Business Activities . . . . .	4
8	Other Financial Industry Activities or Affiliations . . . . .	4
9	Participation or Interest in Client Transactions . . . . .	5
10	Conditions for Managing Accounts . . . . .	5
11	Review of Accounts . . . . .	5
12	Investment or Brokerage Discretion . . . . .	6
13	Additional Compensation . . . . .	6
14	Balance Sheet . . . . .	6
	Continuation Sheet . . . . .	Schedule F
	Balance Sheet, if required. . . . .	Schedule G

(Schedules A, B, C, D, and E are included with Part I of this Form, for the use of regulatory bodies, and are not distributed to clients.)

**Potential persons who are to respond to the collection of information contained in this form  
are not required to respond unless the form displays a currently valid OMB control number.**

**FORM ADV****Part II - Page 2**

Applicant:

**Raymond J. Lucia Companies, Inc.**

SEC File Number:

**801-61496**

Date:

**May 2010****1. A. Advisory Services and Fees.** (check the applicable boxes)For each type of service provided, state the approximate % of total advisory billings from that service.  
(See instruction below.)**Applicant:**

- |                                     |     |   |             |
|-------------------------------------|-----|---|-------------|
| <input type="checkbox"/>            | (1) | Provides investment supervisory services . . . . .  | _____ %     |
| <input type="checkbox"/>            | (2) | Manages investment advisory accounts not involving investment supervisory services . . . . .  | _____ %     |
| <input type="checkbox"/>            | (3) | Furnishes investment advice through consultations not included in either service described above . . . . .  | _____ %     |
| <input type="checkbox"/>            | (4) | Issues periodicals about securities by subscription . . . . .   | _____ %     |
| <input type="checkbox"/>            | (5) | Issues special reports about securities not included in any service described above . . . . .   | _____ %     |
| <input type="checkbox"/>            | (6) | Issues, not as part of any service described above, any charts, graphs, formulas, or other devices which clients may use to evaluate securities . . . . . | _____ %     |
| <input type="checkbox"/>            | (7) | On more than an occasional basis, furnishes advice to clients on matters not involving securities . . . . .   | _____ %     |
| <input type="checkbox"/>            | (8) | Provides a timing service . . . . .   | _____ %     |
| <input checked="" type="checkbox"/> | (9) | Furnishes advice about securities in any manner not described above . . . . .   | <b>100%</b> |

(Percentages should be based on applicant's last fiscal year. If applicant has not completed its first fiscal year, provide estimates of advisory billings for that year and state that the percentages are estimates.)

**B.** Does applicant call any of the services it checked above financial planning or some similar term? . . . . .Yes ☐ No ☒**C.** Applicant offers investment advisory services for: (check all that apply)

- |   |  |
|---|--|
| <input type="checkbox"/> (1) A percentage of assets under management      | <input type="checkbox"/> (4) Subscription fees |
| <input type="checkbox"/> (2) Hourly charges                               | <input type="checkbox"/> (5) Commissions       |
| <input type="checkbox"/> (3) Fixed fees (not including subscription fees) | <input checked="" type="checkbox"/> (6) Other  |

**D.** For each checked box in A above, describe on Schedule F:

- the services provided, including the name of any publication or report issued by the adviser on a subscription basis or for a fee
- applicant's basic fee schedule, how fees are charged and whether its fees are negotiable
- when compensation is payable, and if compensation is payable before service is provided, how a client may get a refund or may terminate an investment advisory contract before its expiration date

**2. Types of clients** - Applicant generally provides investment advice to: (check those that apply)

- |  |   |
|--|---|
| <input type="checkbox"/> A. Individuals                      | <input type="checkbox"/> E. Trusts, estates, or charitable organizations                    |
| <input type="checkbox"/> B. Banks or thrift institutions     | <input type="checkbox"/> F. Corporations or business entities other than those listed above |
| <input type="checkbox"/> C. Investment companies             | <input checked="" type="checkbox"/> G. Other (describe on Schedule F)                       |
| <input type="checkbox"/> D. Pension and profit sharing plans |   |

**Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).**

**FORM ADV****Part II - Page 3**

Applicant:

**Raymond J. Lucia Companies, Inc.**

SEC File Number:

801- **61496**

Date:

**May 2010****3. Types of Investments.** Applicant offers advice on the following: (check those that apply)

- |  |   |
|--|---|
| <input type="checkbox"/> A. Equity securities  | <input type="checkbox"/> H. United States government securities     |
| <input type="checkbox"/> (1) exchange-listed securities                                |   |
| <input type="checkbox"/> (2) securities traded over-the-counter                        | <input type="checkbox"/> I. Options contracts on:                   |
| <input type="checkbox"/> (3) foreign issues  | <input type="checkbox"/> (1) securities                             |
|  | <input type="checkbox"/> (2) commodities                            |
| <input type="checkbox"/> B. Warrants   | <input type="checkbox"/> J. Futures contracts on:                   |
|  | <input type="checkbox"/> (1) tangibles                              |
| <input type="checkbox"/> C. Corporate debt securities<br>(other than commercial paper) | <input type="checkbox"/> (2) intangibles                            |
| <input type="checkbox"/> D. Commercial paper   | <input type="checkbox"/> K. Interests in partnerships investing in: |
| <input type="checkbox"/> E. Certificates of deposit                                    | <input type="checkbox"/> (1) real estate                            |
| <input type="checkbox"/> F. Municipal securities                                       | <input type="checkbox"/> (2) oil and gas interests                  |
|  | <input type="checkbox"/> (3) other (explain on Schedule F)          |
| <input type="checkbox"/> G. Investment company securities:                             | <input type="checkbox"/> L. Other (explain on Schedule F)           |
| <input type="checkbox"/> (1) variable life insurance                                   |   |
| <input type="checkbox"/> (2) variable annuities  |   |
| <input type="checkbox"/> (3) mutual fund shares  |   |

**4. Methods of Analysis, Sources of Information, and Investment Strategies.****A.** Applicant's security analysis methods include: (check those that apply)

- |  |  |
|--|--|
| (1) <input type="checkbox"/> Charting    | (4) <input type="checkbox"/> Cyclical                      |
| (2) <input type="checkbox"/> Fundamental | (5) <input type="checkbox"/> Other (explain on Schedule F) |
| (3) <input type="checkbox"/> Technical   |  |

**B.** The main sources of information applicant uses include: (check those that apply)

- |  |   |
|--|---|
| (1) <input type="checkbox"/> Financial newspapers and magazines    | (5) <input type="checkbox"/> Timing services  |
| (2) <input type="checkbox"/> Inspections of corporate activities   | (6) <input type="checkbox"/> Annual reports, prospectuses, filings with the<br>Securities and Exchange Commission |
| (3) <input type="checkbox"/> Research materials prepared by others | (7) <input type="checkbox"/> Company press releases   |
| (4) <input type="checkbox"/> Corporate rating services             | (8) <input type="checkbox"/> Other (explain on Schedule F)  |

**C.** The investment strategies used to implement any investment advice given to clients include: (check those that apply)

- |   |  |
|---|--|
| (1) <input type="checkbox"/> Long term purchases<br>(securities held at least a year) | (5) <input type="checkbox"/> Margin transactions   |
| (2) <input type="checkbox"/> Short term purchases<br>(securities sold within a year)  | (6) <input type="checkbox"/> Option writing, including covered options, uncovered<br>options or spreading strategies |
| (3) <input type="checkbox"/> Trading (securities sold within 30 days)                 | (7) <input type="checkbox"/> Other (explain on Schedule F)   |
| (4) <input type="checkbox"/> Short sales  |  |

**Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).**

**FORM ADV****Part II - Page 4**

Applicant:

**Raymond J. Lucia Companies, Inc.**

SEC File Number:

**801-61496**

Date:

**May 2010****5. Education and Business Standards.**

Are there any general standards of education or business experience that applicant requires of those involved in determining or giving investment advice to clients? . . . . .

Yes No  
☒ ☐

(If yes, describe these standards on Schedule F.)

**6. Education and Business Background.**

For:

- each member of the investment committee or group that determines general investment advice to be given to clients, or
- if the applicant has no investment committee or group, each individual who determines general investment advice given to clients (if more than five, respond only for their supervisors)
- each principal executive officer of applicant or each person with similar status or performing similar functions.

On Schedule F, give the:

- |                 |  |
|-----------------|--|
| • name          | • formal education after high school               |
| • year of birth | • business background for the preceding five years |

**7. Other Business Activities.** (check those that apply)

- ☐ A. Applicant is actively engaged in a business other than giving investment advice.
- ☐ B. Applicant sells products or services other than investment advice to clients.
- ☒ C. The principal business of applicant or its principal executive officers involves something other than providing investment advice.

(For each checked box describe the other activities, including the time spent on them, on Schedule F.)

**8. Other Financial Industry Activities or Affiliations.** (check those that apply)

- ☐ A. Applicant is registered (or has an application pending) as a securities broker-dealer.
- ☐ B. Applicant is registered (or has an application pending) as a futures commission merchant, commodity pool operator or commodity trading adviser.
- C. Applicant has arrangements that are material to its advisory business or its clients with a related person who is a:
- |  |  |
|--|--|
| <input type="checkbox"/> (1) broker-dealer   | <input type="checkbox"/> (7) accounting firm                                       |
| <input type="checkbox"/> (2) investment company  | <input type="checkbox"/> (8) law firm  |
| <input type="checkbox"/> (3) other investment adviser  | <input checked="" type="checkbox"/> (9) insurance company or agency                |
| <input type="checkbox"/> (4) financial planning firm   | <input type="checkbox"/> (10) pension consultant                                   |
| <input type="checkbox"/> (5) commodity pool operator, commodity trading adviser or futures commission merchant | <input type="checkbox"/> (11) real estate broker or dealer                         |
| <input type="checkbox"/> (6) banking or thrift institution   | <input type="checkbox"/> (12) entity that creates or packages limited partnerships |

(For each checked box in C, on Schedule F identify the related person and describe the relationship and the arrangements.)

- D. Is applicant or a related person a general partner in any partnership in which clients are solicited to invest?.....

Yes No  
☐ ☒

(If yes, describe on Schedule F the partnerships and what they invest in.)

**Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).**

**FORM ADV****Part II - Page 5**

Applicant:

**Raymond J. Lucia Companies, Inc.**

SEC File Number:

801- **61496**

Date:

**February 2011****9. Participation or Interest in Client Transactions.**

Applicant or a related person: (check those that apply)

- ☐ A. As principal, buys securities for itself from or sells securities it owns to any client.
- ☐ B. As broker or agent effects securities transactions for compensation for any client.
- ☐ C. As broker or agent for any person other than a client effects transactions in which client securities are sold to or bought from a brokerage customer.
- ☐ D. Recommends to clients that they buy or sell securities or investment products in which the applicant or a related person has some financial interest.
- ☐ E. Buys or sells for itself securities that it also recommends to clients.

(For each box checked, describe on Schedule F when the applicant or a related person engages in these transactions and what restrictions, internal procedures, or disclosures are used for conflicts of interest in those transactions.)

Describe, on Schedule F, your code of ethics, and state that you will provide a copy of your code of ethics to any client or prospective client upon request.

- 10. Conditions for Managing Accounts.** Does the applicant provide investment supervisory services, manage investment advisory accounts or hold itself out as providing financial planning or some similarly termed services *and* impose a minimum dollar value of assets or other conditions for starting or maintaining an account? . . . . .

Yes No  
☐ ☒

(If yes, describe on Schedule F.)

- 11. Review of Accounts.** If applicant provides investment supervisory services, manages investment advisory accounts, or holds itself out as providing financial planning or some similarly termed services:

- A. Describe below the reviews and reviewers of the accounts. **For reviews**, include their frequency, different levels, and triggering factors. **For reviewers**, include the number of reviewers, their titles and functions, instructions they receive from applicant on performing reviews, and number of accounts assigned each.

**Please refer to Schedule F**

- B. Describe below the nature and frequency of regular reports to clients on their accounts.

**Please refer to Schedule F****Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).**

Applicant:

Raymond J. Lucia Companies, Inc.

SEC File Number:

801-61496

Date:

May 2010

**12. Investment or Brokerage Discretion.**

A. Does applicant or any related person have authority to determine, without obtaining specific client consent, the:

(1) securities to be bought or sold? . . . . .

Yes No

☐ ☒

(2) amount of the securities to be bought or sold ? . . . . .

Yes No

☐ ☒

(3) broker or dealer to be used ? . . . . .

Yes No

☐ ☒

(4) commission rates paid? . . . . .

Yes No

☐ ☒

B. Does applicant or a related person suggest brokers to clients? . . . . .

Yes No

☐ ☒

For each yes answer to A describe on Schedule F any limitations on the authority. For each yes to A(3), A(4) or B, describe on Schedule F the factors considered in selecting brokers and determining the reasonableness of their commissions. If the value of products, research and services given to the applicant or a related person is a factor, describe:

- the products, research and services
- whether clients may pay commissions higher than those obtainable from other brokers in return for those products and services
- whether research is used to service all of applicant's accounts or just those accounts paying for it; and
- any procedures the applicant used during the last fiscal year to direct client transactions to a particular broker in return for products and research services received.

**13. Additional Compensation.**

Does the applicant or a related person have any arrangements, oral or in writing, where it:

A. is paid cash by or receives some economic benefit (including commissions, equipment or non-research services) from a non-client in connection with giving advice to clients? . . . . .

Yes No

☒ ☐

B. directly or indirectly compensates any person for client referrals? . . . . .

Yes No

☐ ☒

(For each yes, describe the arrangements on Schedule F.)

**14. Balance Sheet.** Applicant must provide a balance sheet for the most recent fiscal year on Schedule G if applicant:

- has custody of client funds or securities unless applicant is registered or registering only with the Securities and Exchange Commission; or
- requires prepayment of more than \$500 in fees per client and 6 or more months in advance

Has applicant provided a Schedule G balance sheet? . . . . .

Yes No

☐ ☒

**Schedule F of  
Form ADV**

**Continuation Sheet for Form ADV Part II**

Applicant:	SEC File Number:	Date:
<b>Raymond J. Lucia Companies, Inc.</b>	<b>801-61496</b>	<b>February 2011</b>

Item of Form (identify)	Answer
Part II, Page 2, Item 1.D.	<p><b>Raymond J. Lucia Companies, Inc.</b> (referred to as “Advisor” throughout this document) is a corporation formed under the laws of the State of California. This Schedule F narrative provides clients with information regarding Advisor, its business practices and nature of arrangements. Additional information about Advisor is available through the SEC’s website at <a href="http://www.adviserinfo.sec.gov">www.adviserinfo.sec.gov</a>. Clients can search this site by using Advisor’s name or by an identification number known as a CRD number. The CRD number for Advisor is 115670.</p> <p style="text-align: center;"><b>ADVISORY SERVICES AND FEES</b></p> <p><b><u>A. Seminars</u></b></p> <p>Advisor may present seminars on general financial and investment topics or specifically on the Buckets of Money® strategy. Generally, these seminars will be presented at no charge. However, in some instances a fee may be charged to cover the cost of providing the seminar and any materials presented at the seminar. Participants will be informed of any seminar charges in advance and charges will be due at the time the seminar is held.</p> <p><b><u>B. Arrangement with RJL Wealth Management, LLC</u></b></p> <p>Advisor has entered into a solicitor arrangement with RJL Wealth Management, LLC (RJLWM) whereby Advisor refers clients that may be candidates for investment advisory services, to RJLWM. Advisor will also refer leads generated through Raymond J. Lucia Enterprises (RJL Enterprises) to RJLWM. RJLWM has agreed to compensate Advisor for client referrals and for referrals of leads generated through RJL Enterprises. Compensation to Advisor is not dependent on the client entering into an advisory agreement with RJLWM. Compensation to Advisor is a flat fee (currently \$10 per referral) and is <u>not</u> based on a percentage of the advisory fee charged by RJLWM to clients referred by Advisor. The arrangement between Advisor and RJLWM is in compliance with federal and state regulations (as applicable) specific to the payment of compensation to referring parties. The solicitation/referral fee is paid pursuant to a written agreement retained by both Advisor and RJLWM. Advisor is required to provide prospective RJLWM clients with a copy of RJLWM’s disclosure document and a solicitor disclosure statement at the time of one-on-one solicitation activities. Raymond J. Lucia, Sr. may discuss investment products that may be available on a fee-basis (through RJLWM) vs. a commission basis (through associated persons of RJLWM acting in their separate capacities as registered representatives of First Allied Securities); however he is not permitted to offer clients any investment advice <u>on behalf of</u> RJLWM. The advisory fee charged by RJLWM to clients referred by Advisor is not higher than fees charged to other RJLWM clients and therefore is not increased as a result of compensation being shared by RJLWM with Advisor.</p> <p>In addition to Advisor’s role of acting as solicitor to RJLWM, Raymond J. Lucia, Sr. currently provides economic, financial and business consultation to investment professionals at RJLWM. As part of his consultant role, Raymond J. Lucia, Sr. serves as a member of the RJLWM Macro Investment Committee which has been formed by RJLWM to develop, monitor and manage the RJL Risk Managed Strategies, a wrap fee program sponsored by and available through RJLWM.</p> <p>RJLWM is owned and operated by Raymond J. Lucia, Jr. who was formerly an investment advisor representative with Advisor. In addition, the majority of RJLWM financial professionals were formerly licensed as investment advisor representatives with Advisor. Advisor continues to share office space with RJLWM.</p> <p>While RJLWM is not related or affiliated with First Allied Securities, Inc. (“FASI”), RJLWM’s associated persons are registered representatives of FASI, a full-service broker/dealer, member</p>
Part II, Page 2, Item 1.D.	

Complete amended pages in full, circle amended items and file with execution page (page 1).

**Schedule F of  
Form ADV**

**Continuation Sheet for Form ADV Part II**

Applicant:	SEC File Number:	Date:
<b>Raymond J. Lucia Companies, Inc.</b>	<b>801-61496</b>	<b>February 2011</b>

Item of Form (identify)	Answer
(continued)	<p>FINRA/SIPC. When placing securities transactions through FASI in their capacity as registered representatives, RJLWM's associated persons may earn sales commissions.</p> <p>Raymond J. Lucia, Sr. is no longer registered with FASI, and does not therefore conduct business on behalf or under the supervision of FASI. Raymond J. Lucia, Sr. is compensated by RJLWM on a consultancy fee basis. In addition, RJL Enterprises is compensated by RJLWM for marketing services.</p> <p>Raymond J. Lucia, Sr. is not registered to place securities transactions through FASI, does not manage investments through RJLWM, and is not affiliated with either RJLWM or FASI.</p> <p>Advisor does not receive compensation based on the nature or number of transactions or the value of assets managed in a client's account.</p> <p>Clients referred by Advisor to RJLWM are not obligated or otherwise required to select the services of RJLWM or FASI. Clients may select any broker/dealer, investment advisor or other financial professional they choose.</p>
Part II, Page 2, Item 2	<p><b>TYPES OF CLIENTS:</b></p> <p>Raymond J. Lucia, Sr. currently provides economic, financial and business consultation to financial services firms including RJLWM. He does not provide manage client accounts or provide financial planning services to retail or institutional clients.</p>
Part II, Page 4, Item 5	<p><b>EDUCATION AND BUSINESS STANDARDS.</b> Advisor requires persons providing advisory services to clients to have all required securities licenses. Advisor's President will also consider business experience, professional designations and other criteria on an individual basis.</p>
Part II, Page 4, Item 6	<p><b>EDUCATION AND BUSINESS BACKGROUND OF ADVISOR'S OWNER AND INVESTMENT ADVISOR REPRESENTATIVE.</b></p> <p><b>Raymond J. Lucia, Sr., CFP® - Born 04/50</b>  <i>Education Background After High School</i>  BS, Humanities: California Western University, 1970 California Teacher's Credential, 1970-1971 San Diego State University, 1968-1969 Western Illinois University, 1968  <i>Business Background</i>  Raymond J. Lucia Companies, Inc., Owner/President/Secretary/Treasurer/Investment Advisor Representative, 10/94-Present;  First Allied Securities, Inc., Registered Representative and Registered Principal, 11/07-05/10;  Lucia Financial, LLC, Director, Owner and Registered Representative, 10/2006-05/10;  24-7 Financial Advisors, Inc., President, 2/00-03/03, Investment Advisor Representative, 2/00-9/03; sole owner, 3/03-09/03;  LLK Insurance Brokerage Services, LLC, Partner, 04/09-Present  Raymond J. Lucia Enterprises (formerly Lucia Financial Group, Inc. d/b/a Lucia Insurance Service and also d/b/a Pro-Consultants), President, Owner, 1974-Present;  RJL Financial Network, L.L.C., President, Director &amp; Owner, 7/03-12/07; Investment Advisor Representative, 4/04-12/07;  Securities America, Inc., Registered Representative and Registered Principal, 9/02-11/07;  Lucia, LLC, Owner &amp; Member, 2001-2006;  Spectrum Professional Management, Inc., President, 1/83-12/02;  The Advisors Group, Registered Representative, 8/95-9/02; and  The Acacia Group, Managing Director and Agent, 8/96-12/02.</p>

Complete amended pages in full, circle amended items and file with execution page (page 1).

**Schedule F of  
Form ADV**

**Continuation Sheet for Form ADV Part II**

Applicant:	SEC File Number:	Date:
<b>Raymond J. Lucia Companies, Inc.</b>	<b>801-61496</b>	<b>February 2011</b>

Item of Form (identify)	Answer
Part II, Page 4, Item 8	<p>Raymond J. Lucia, Sr. is actively engaged in various media activities. These activities are conducted through Raymond J. Lucia Enterprises. Mr. Lucia spends approximately 80% of his time in these activities. Generally, these activities include public and private speaking engagements and television and radio commercials. Specifically, Mr. Lucia has been the host of "The Ray Lucia Show", a nationally syndicated daily financial talk show, since 1991. He also acts as a Financial Contributor for various media companies. Mr. Lucia also spends a small amount of his time on publishing activities with Wiley &amp; Sons. He is available as a convention and conference speaker, but spends only a small amount of his time on these engagements.</p> <p>In addition to his financial and media industry activities, Mr. Lucia is a general partner and/or owner of several investment related limited partnerships and limited liability companies. However, none of Mr. Lucia or Advisor's clients are invested or solicited to invest in any limited partnership or limited liability company that Mr. Lucia has personally invested in.</p> <p><b><u>SPECIFIC DISCLOSURES REGARDING CELEBRITY SPOKESPERSONS</u></b></p> <p>Celebrity spokespersons are paid for their time, comments and/or appearances by Raymond J. Lucia, Sr. through Raymond J. Lucia Enterprises and Advisor. Celebrity spokespersons are NOT clients of Advisor. Their appearances with Raymond J. Lucia, Sr. should not be considered direct or indirect endorsements of Advisor. DO NOT make investment decisions based on the comments of celebrity spokespersons.</p> <p><b><u>OTHER FINANCIAL INDUSTRY ACTIVITIES OR AFFILIATIONS</u></b></p> <p>Advisor's owner, Raymond J. Lucia, Sr. is a member and partner of LLK Insurance Brokerage Services, LLC, doing business as RJJ Insurance Services, an insurance agency. Advisor's clients that are in need of insurance products, clients may be referred to LLK Insurance Brokerage Services, LLC. The amount of the advisory fee is not increased due to this arrangement and clients are not obligated to use the services of LLK Insurance Brokerage Services, LLC. While Advisor does not receive compensation for referrals to LLK Insurance Brokerage Services, LLC, the Advisor and LLK Insurance Brokerage Services, LLC are under common ownership and there is a benefit for the two firms to share clients.</p> <p>LLK Insurance Brokerage Services, LLC is also owned by Raymond J. Lucia, Jr., the owner of RJJWM. Investment advisor representatives of RJJWM may also conduct insurance business through LLK Insurance Brokerage Services, LLC in their separate capacities as independent insurance agents. Therefore, when Advisor refers a client or a lead generated through RJJ Enterprises to RJJWM, the referred party may be solicited insurance products through LLK Insurance Brokerage Services, LLC. When a client purchases insurance products through an associated person of Advisor or RJJWM, the client will be charged commissions which are in addition separate from fees earned by Advisor or RJJWM and commissions earned through FASI. Commissions will be retained by Advisor's associated persons or RJJWM associated persons acting in their separate capacities as independent insurance agents.</p> <p><b><u>REVIEW OF ACCOUNTS</u></b></p> <p>Advisor does not provide investment supervisory services and does not manage client accounts.</p>
Code of Ethics Summary	<p>Advisor has established a Code of Ethics which all associated persons must read. They must then execute an acknowledgment agreeing that they understand and agree to comply with Advisor's</p>

**Complete amended pages in full, circle amended items and file with execution page (page 1).**

**Schedule F of  
Form ADV**

**Continuation Sheet for Form ADV Part II**

Applicant:

**Raymond J. Lucia Companies, Inc.**

SEC File Number:

**801-61496**

Date:

**February 2011**

Item of Form (identify)	Answer
Customer Privacy Policy Notice	<p>Code of Ethics. The fiduciary duty of Advisor and its supervised persons is considered the core underlying principle for Advisor's Code of Ethics and represents the expected basis for all supervised persons' business dealings. All supervised persons will conduct business in an honest, ethical and fair manner. Supervised persons will comply with all federal and state securities laws at all times. Full disclosure of all material facts and potential conflicts of interest will be provided prior to services being conducted.</p> <p>Supervised persons have a responsibility to avoid circumstances that might negatively affect or appear to affect the associated persons' duty of complete loyalty to their clients. This section is only intended to provide individuals with a description of Advisor's Code of Ethics. If an individual wishes to review Advisor's Code of Ethics in its entirety, a copy may be requested from any of Advisor's associated persons and a copy will be provided promptly.</p> <p><b>CUSTOMER PRIVACY POLICY NOTICE</b></p> <p>Regulation S-P, Privacy of Consumer Financial Information, requires financial institutions, including Advisor, to provide notice to current clients and prospective clients about their policies and practices concerning the collection and use of customer, non-public information. This privacy policy notice is given to all prospective clients of Advisor upon entering into a contract with Advisor and annually thereafter.</p> <p><b>Privacy Disclosure Statement – Leads Generated through RJJ Enterprises.</b> The following applies to information of RJJ Enterprises consumers that are not clients of Advisor. Advisor will forward non-public information of individuals providing their personal, non-public information to RJJ Enterprises. The information collected by RJJ Enterprises and shared with Advisor will be forwarded to RJJWM as a result of the referral arrangement between Advisor and RJJWM. Individuals may provide personal information such as names, addresses, financial information and other non-public information as a result of attending a Raymond J. Lucia, Sr. seminar, listening to a broadcast of "The Ray Lucia Show" or other Raymond J. Lucia, Sr. media event. Disclosure of RJJ Enterprises intent to share non-public information with Advisor and Advisor's intent to forward the information to RJJWM will be fully disclosed at the time an individual provides his or her non-public information to RJJ Enterprises.</p> <p><b>Information Safeguarding.</b> Advisor has implemented strict policies and procedures aimed at protecting the sensitive nature of client information. Advisor restricts access to client information to only those members of Advisor that must provide products and services to clients. Advisor has implemented physical, electronic, and procedural safeguards aimed at meeting Advisor's duty to protect nonpublic client information.</p> <p>If you have any questions concerning Advisor's customer privacy policy or concerns about your personal information please feel free to contact Advisor.</p>

**Complete amended pages in full, circle amended items and file with execution page (page 1).**