

Luken Investment Analytics, LLC Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of Luken Investment Analytics, LLC. If you have any questions about the contents of this brochure, please contact us at (615) 376-4588 or by email at: carri@lukenanalytics.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 Luken Investment Analytics, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. Luken Investment Analytics, LLC's CRD number is: 169008

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Registration does not imply a certain level of skill or training

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Item 2: Material Changes

The material changes in this brochure from the last updating amendment of Luken Investment Analytics, LLC are described below. This list summarizes changes to policies, practices or conflicts of interests only.

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No Material Changes

Item 3: Table of Contents

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Item 4: Advisory Business

A. Description of the Advisory Firm

Luken Investment Analytics, LLC (hereinafter "LIA") is a Limited Liability Company organized in the State of Tennessee. LIA is a registered investment adviser registered with the Securities and Exchange Commission (SEC).

The firm was formed in May 2013, and the principal owner is Gregory Lee Luken.

B. Types of Advisory Services

LIA provides investment advisory services to individual investors ("Clients") and provides investment models to other registered investment advisers and investment adviser representatives ("Subscribers"). As a registered investment adviser, we are held to the highest standard of client care - a fiduciary standard. As a fiduciary we always put our client's interests first and must fully disclose any potential conflict of interest. We do not directly hold customer funds or securities.

It is the Firm's policy to seek the best possible executions at all times. The firm does not act as principal, but rather as agent on customer transactions.

LIA offers the following advisory programs:

Consulting Services Program

LIA provides consulting services to individual retail Clients. Clients pay a one-time fee for this program. Clients pay a deposit and the remainder of the fee for this program is due when the financial plan is delivered. Services include some or all of the following: general investment education, retirement planning, estate planning, college planning, debt and cash flow analysis, analysis with regard to investment of distributions from employer retirement plans and profit sharing plans. Clients will receive a written financial plan designed to assist Clients in identifying specific financial objectives and goals.

Discretionary WRAP Program

LIA provides discretionary investment advisory services to individual retail Clients. Clients pay the fee for this program monthly in advance. LIA receives no additional payments or commissions for accounts in this program. These services include some or all of the following; preparation of financial plans, explanation of investment concepts and strategies, asset allocation modeling, assistance with interpreting investment performance reports, broader assessments of the Clients' overall financial situation, income needs and goals. The Clients' goals, objectives and risk tolerance are matched with the model or models that are most suitable. Model allocations are reviewed quarterly and adjustments are made as

necessary to realign with the model allocation. Clients can cancel the advisory services by giving 30 days written notice.

In the case where a client has a third party adviser, such third party adviser selects the particular model that that third party adviser believes is the most suitable, and LIA will manage the account on a discretionary basis using the model selected by the third party adviser.

Model Subscription Program

LIA provides newsletter subscription services for a fee to Subscribers. These services include a newsletter and security ratings service that will offer recommendations on purchasing and selling specific securities, sectors, asset classes, or other specific groupings of securities at a stated time. This newsletter will be provided via electronic mail and via a website and can be cancelled by giving 30 days written notice. Transaction recommendations are sent to our Subscribers for them to communicate to their qualified custodians who execute, compare, allocate, clear, and settle the transactions. We neither handle nor execute trades for Subscribers.

Allocation Model Descriptions

LIA uses an innovative application of math to determine how a portfolio is diversified, all based on facts, rules and math. This global, macro-economic, top-down approach means that LIA looks at investments from around the world and filters them through a 3-stage (or 3-factor) process. The fact-based model looks at 1) Trend 2) Strength and 3) Risk of each asset class to determine how much, if any, goes into the portfolio.

Broad Scope Model

Broad Scope is a globally diversified, risk managed investment portfolio model designed for growth without regard for tax consequences. The Smart Diversification® portion of the portfolio will mathematically reallocate around the strategic core. Broad Scope is likely to have a reallocation 2 to 4 quarters per year, is not designed for inherent tax efficiency and can include alternative investment classes such as broad based commodities index exposure, gold, any type of fixed income or equity as well as managed futures.

Income Model

Income is a globally diversified, risk managed investment portfolio model designed for income and growth with an emphasis on equity income. The Smart Diversification® portion of the portfolio will mathematically reallocate around the strategic core. Income is likely to have a reallocation 1 to 4 quarters per year, is not designed for inherent tax

efficiency and can include alternative investment classes such as broad based commodities index exposure, gold, any type of fixed income or equity as well as managed futures.

Tax Aware Model

Tax Aware is a globally diversified, risk managed investment portfolio model designed for growth and engineered to minimize tax consequences. The Smart Diversification® portion of the portfolio will mathematically reallocate around the strategic core. Tax Aware is likely to have a reallocation 0 to 2 quarters per year, is designed for tax efficiency and has limited alternative investment class exposure compared to other portfolios.

Services Limited to Specific Types of Investments

LIA will assign each account to a model based on the clients' investment needs. The investments will primarily consist of Mutual Funds, Equity Securities, and Exchange Traded Funds to a majority of its Clients and Subscribers.

Advisory Representatives

In addition to LIA, the Representative who recommends the advisory program to the Client receives compensation as a result of the Client's participation in the program. Our advisory personnel are expected to have education and business backgrounds that enable them to perform their respective responsibilities effectively. No formal standards have been set, but appropriate education and experience are required. See your Representative's Form ADV Part 2B Brochure Supplement for additional information on their background and experience.

C. Client Tailored Services and Client Imposed Restrictions

Advisory Client investment strategies and their implementation are dependent upon our consulting with the Client and reviewing each client's current situation (objectives, goals, income, tax levels, and risk tolerance levels). LIA makes recommendations and suitability determinations as to which asset allocation models are best for its Clients based upon information provided by the Client. It is important that each Client provide accurate and complete responses to the questions asked by the Representative and that the Client promptly inform the Representative of any subsequent changes to the information provided. Clients cannot impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs.

For our Investment Adviser Representative Subscribers, specific client investment strategies and their implementation are dependent upon the Subscriber consulting with their client and reviewing their Investment Policy Statement, or similar documents, which outlines their client's current situation (income, tax levels, and risk tolerance levels). LIA does not make

recommendations or suitability determinations as to which strategies are best for its Subscribers or their clients. The Subscriber determines if their clients cannot impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs.

You should be aware that all investment programs involve risk and there is no guarantee that using our Services will produce favorable results. Please carefully review the information and statements contained in any investment related materials provided to you and be sure to ask for assistance in clarifying any questions you have regarding the materials you receive. LIA suggests that each Client works closely with their Representative, attorney, accountant and insurance agent.

D. WRAP Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, and other administrative fees. LIA sponsors one wrap fee program, The Discretionary Wrap Program. LIA retains a portion of the wrap fee for its services, and uses the remainder of the fee to pay for transaction costs and other administrative fees. Further details relating to this program are available in Appendix 1: Wrap Program Brochure.

E. Assets Under Management

As of January 23, 2018, LIA has a total of \$100,023,491 assets under management. LIA manages \$100,004,643 of client assets on a discretionary basis and \$18,848 on a non-discretionary basis.

Item 5: Fees and Compensation

A. Fee Schedule

Consulting Fees

Fees for the Consulting Program are a flat fee based upon the complexity of the consulting arrangement and services to be rendered. The fees for this program are negotiable and generally range from \$500 to \$5,000.

Discretionary Wrap Program Fees

Client Advisory Programs fees are billed monthly in advance and are debited directly from the Client account. The annual advisory fee can be a specific fee percentage; however the fee is most often based on a sliding schedule that

ranges from 30 to 160 basis points that is negotiable between the Client and the Representative. This results in different fees for similar accounts. Based on your investment portfolio and investment strategy, the costs associated with an advisory account can exceed the commissions you would pay for brokerage services only.

Model Subscription Fees

LIA offers a monthly subscription newsletter and quarterly allocation updates to other Registered Investment Advisers and Investment Adviser Representatives. Subscribers choose between varying subscription levels that include services ranging from newsletters and allocation updates to personalized onboarding and annual client seminars. The subscription dues are generally charged monthly in advance; however subscribers have the option to pay annually in advance at a discounted rate. For current subscription levels and rates, please email greg@lukenanalytics.com or call 615-550-5570.

Subscribers, who have more than \$50,000,000 in subscribed assets, also pay an additional 1 basis point based on the value of their subscribed assets. This basis point is charged annually in arrears.

Subscription fees can also be paid to LIA as basis points based on assets under management without an annual fee. These fees are paid monthly in arrears.

Subscription fees are generally not negotiable.

Termination of Agreement

The standard advisory contract has an initial term of one year and automatically renews for unlimited one-year terms. Clients and Subscribers can terminate their agreement without penalty, for full refund of LIA's fees, within five business days of signing the Investment Advisory Contract or Subscription Agreement. Thereafter, Clients and Subscribers can terminate their Advisory Contract or Subscription Agreement with thirty days written notice. Any unearned portion of fees paid in advance will be refunded. LIA reserves the right to charge a \$100 termination fee if the advisory account is terminated by Client within the first year.

B. Payment of Fees

Payment of Consulting Fees

Consulting Services Program fees are negotiated before the plan is created. A deposit is requested and full payment is due when the financial plan is delivered.

Payment of Discretionary WRAP Program Fees

Advisory fees are paid monthly in advance and are debited directly from the Client account. Fees are calculated by multiplying the account value on the last day of the previous month by the annual fee percentage, then multiplying by the

number of days in the upcoming month divided by the number of days in the year.

Payment of Subscription Fees

Subscription fees are generally paid monthly or annually via credit card. Basis point subscription fees are paid directly to LIA via ACH transfer.

C. Clients Are Responsible For Third Party Fees

For individual Clients who pay LIA advisory fees, in addition to our advisory fee, you will incur certain charges imposed by third parties which are not assessed or received by LIA or your Representative. Such charges include, but are not limited to, custodial fees, clearing firm fees, charges imposed by a mutual fund, index fund, or exchange traded fund purchased for the account which shall be disclosed in the fund's prospectus (e.g., fund management fees and other fund expenses), certain deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, brokerage account termination fees, annual account maintenance fees, SEC fees, Reg Fees, Trading Activity Fees, exchange and floor fees, and other fees and taxes on brokerage accounts and securities transactions.

D. Prepayment of Fees

As described above, LIA collects its fees in advance. Upon termination, any unearned portion of fees paid in advance will be refunded.

E. Outside Compensation

Gregory L. Luken is President of Luken Investment Analytics, LLC and a licensed insurance agent. From time to time, he will offer clients advice or products in his capacity as an insurance agent.

1. Conflict of Interest

This presents a conflict of interest and provides an incentive to recommend products based on the compensation received rather than on the client's needs. When recommending the sale of insurance products for which any supervised person receives compensation, LIA will document the conflict of interest in the client file and inform the client of the conflict of interest. Clients should be aware that these services pay a commission or other forms of compensation and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. LIA always acts in the best interest of the client; including in the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of LIA in their outside capacity. Clients always have the option to

purchase LIA recommended insurance products through other brokers or agents that are not affiliated with LIA.

2. Commissions are not a Source of Income for LIA

LIA charges subscription fees for its subscription service and advisory fees as a percentage of assets under management. LIA does not charge commissions for its advisory services. Insurance fees and commissions are not a primary source of compensation for LIA's advisory services.

3. Advisory Fees in Addition to Commissions or Markups

LIA does not charge commissions or markups based on the securities selected for client advisory accounts. Advisory fees paid by clients are not reduced to offset any fee or commission received from the sale of insurance products.

Item 6: Performance-Based Fees and Side-By-Side Management

LIA does not accept performance-based fees or other fees based on a share of capital gains on, or capital appreciation of, the assets of a client.

LIA does not engage in Side-By-Side Management.

Item 7: Types of Clients

LIA provides investment advisory services to individual investors, families, high net worth investors, trusts, estates, retirement plan participants and private business owners.

LIA provides investment subscription services to Registered Investment Advisers and Investment Adviser Representatives

Minimum Account Size

There is no account minimum for any of LIA's services.

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

A. Methods of Analysis and Investment Strategies

Methods of Analysis

LIA's methods of analysis include charting analysis, technical analysis and quantitative analysis.

Charting analysis involves the use of patterns in performance charts. LIA uses this technique to search for patterns used to help predict favorable conditions for buying and/or selling a security.

Technical analysis involves the analysis of past market data; primarily price and volume.

Quantitative analysis deals with measurable factors as distinguished from qualitative considerations, such as the character of management or the state of employee morale, the value of assets, the cost of capital, historical projections of sales, and so on.

Investment Strategies

LIA uses long term trading, short term trading and short-term purchase investment strategies.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

B. Material Risks Involved

Risks Associated with Methods of Analysis

Charting analysis strategy involves using and comparing various charts to predict long and short term performance or market trends. The risk involved in using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. Past performance is not indicative of future performance.

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns, thus relying *solely* on this method does not always work.

Quantitative Model Risk: Investment strategies using quantitative models perform differently than expected as a result of, among other things, the factors used in the models, the weight placed on each factor, changes from the factors'

historical trends, and technical issues in the construction and implementation of the models.

Risks Associated with Investment Strategies

LIA's use of short term trading holds greater risk and clients should be aware that there is a material risk of loss using any of those strategies.

Long term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, liquidity risk, market risk, and political/regulatory risk.

Short term trading risks include liquidity, economic stability and inflation, in addition to the long term trading risks listed above. Frequent trading, can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

Lack of Diversification presents risks when investments are concentrated and diversification is limited. There are no limits on position sizes.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

It should not be assumed that recommendations made in the future will be profitable or will equal the performance of the securities in the lists provided with the subscription.

C. Risk of Specific Securities Utilized

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below are not guaranteed or insured by the FDIC or any other government agency.

Mutual Funds: Investing in mutual funds carries the risk of capital loss and thus you can lose money investing in mutual funds. All mutual funds have costs that lower investment returns. They can be of bond "fixed income" nature (lower risk) or stock "equity" nature (mentioned below).

Equity: Investment in equities generally refers to buying shares of stocks in return for receiving a future payment of dividends and capital gains if the value of the stock increases. The value of equity securities fluctuates in response to

specific situations for each company, industry market conditions and general economic environments.

Exchange Traded Funds (ETFs): Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). The price of Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed “electronic shares” not physical metal) are negatively impacted by several factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors. This is not meant to be an exhaustive list of all possible risks associated with ETF’s. Please ask your adviser for more information if you have further questions.

Bonds (Interest Rate Risk): Investing in bonds carries the risk that bond prices will fall as interest rates rise. By buying a bond, the bondholder has committed to receiving a fixed rate of return for a fixed period.

Cash and Cash Equivalents: Accounts can maintain significant cash positions from time to time. The client will pay the advisory fee based on the value of the account, including cash and cash equivalents. In these cases, the account will forego investment opportunities and continue to hold cash positions until the model indicates that it is time for investment.

Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

A. Registration as a Broker/Dealer or Broker Dealer Representative

LIA is not affiliated with a Broker/Dealer.

Carri Sanford, Chief Compliance Officer, is registered with Wiley Bros.-Aintree Capital, LLC, a broker/dealer and SEC registered investment adviser, and acts as a member of the compliance team for special projects.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Adviser

Neither LIA nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Adviser or an associated person of the foregoing entities.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

Gregory L. Luken is President of Luken Investment Analytics, LLC and a licensed insurance agent. From time to time, he will offer clients advice or products in his capacity as an insurance agent. This presents a conflict of interest and provides an incentive to recommend products based on the compensation received rather than on the client's needs. Please refer to Item 5 E above for additional details.

D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections

LIA does not utilize nor select third-party investment advisers.

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

A. Code of Ethics

LIA has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions

Procedures and Reporting, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Political and Charitable Contributions, Service on a Board of Directors, Confidentiality, Compliance Procedures, Compliance with Laws and Regulations, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Our Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

LIA does not recommend that clients buy or sell any security in which a related person to LIA or LIA has a material financial interest.

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of LIA buy or sell securities for themselves that they also recommend to clients. This provides an opportunity for representatives of LIA to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions create a conflict of interest. LIA will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

D. Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of LIA buy or sell securities for themselves at or around the same time as clients. This provides an opportunity for representatives of LIA to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions create a conflict of interest; however, LIA will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

Item 12: Brokerage Practices

A. Factors Used to Select Custodians and/or Broker/Dealers

LIA considers factors such as the security of client accounts and non-public client information as well as the quality of trade executions and account services when selecting a Custodian and Broker/Dealer. LIA also considered the reasonableness of the Custodians account servicing fees that the Client will incur. LIA is not an affiliate of the Custodian or Broker/Dealer.

1. Research and Other Soft-Dollar Benefits

LIA receives no research, product or services from a broker-dealer or third party in connection with client securities transactions ("soft dollar benefits").

2. Brokerage for Client Referrals

LIA participates in the TD Ameritrade Institutional program. TD Ameritrade Institutional is a division of TD Ameritrade, Inc. ("TD Ameritrade") member FINRA/SIPC. TD Ameritrade is an independent [and unaffiliated] SEC-registered broker-dealer. TD Ameritrade offers to independent investment Advisors services which include custody of securities, trade execution, clearance and settlement of transactions. Advisor receives some benefits from TD Ameritrade through its participation in the program. (Please see the disclosure under Item 14 below.)

3. Clients Directing Which Broker/Dealer/Custodian to Use

LIA does not allow Clients to direct brokerage.

B. Aggregating (Block) Trading for Multiple Client Accounts

LIA performs investment management services for various clients. There are occasions on which portfolio transactions are executed as part of concurrent authorizations to purchase or sell the same security for numerous accounts served by our firm, which involve accounts with similar investment objectives. Although such concurrent authorizations potentially could be either advantageous or disadvantageous to any one or more particular accounts, they are affected only when we believe that to do so will be in the best interest of the affected accounts. When such concurrent authorizations occur, the objective is to allocate the executions in a manner which is deemed equitable to the accounts involved. In any given situation, we attempt to allocate trade executions in the most equitable manner possible, taking into consideration client objectives, current asset allocation and availability of funds using price averaging, proration and consistently non arbitrary methods of allocation.

Item 13: Reviews of Accounts

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

Gregory Luken conducts annual client review meetings with each client. The nature of this review is to maintain current client information and ensure the Client is on the most appropriate model. Client accounts are also reviewed by the CCO, Carri Sanford, on an annual basis for items such as red flags and suitability.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Factors that will trigger a non-periodic review of a Client account include, but are not limited to, large deposits or withdrawals, customer complaints and changes in trading activity.

C. Content and Frequency of Regular Reports Provided to Clients

Clients are provided by the custodian, at least quarterly, with transaction confirmation notices and account statements. Clients are also provided performance reports through Orion Adviser Services.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

As disclosed under Item 12 above, LIA participates in TD Ameritrade's institutional customer program and Advisor recommends TD Ameritrade to Clients for custody and brokerage services. There is no direct link between LIA's participation in the program and the investment advice it gives to its Clients, although LIA receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving Advisor participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to LIA by third party vendors. TD Ameritrade has also have paid for

business consulting and professional services received by LIA's related persons. Some of the products and services made available by TD Ameritrade through the program benefit LIA but do not benefit its Client accounts. These products or services assist LIA in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help LIA manage and further develop its business enterprise. The benefits received by LIA or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, LIA endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by LIA or its related persons in and of itself creates a conflict of interest and indirectly influences LIA's choice of TD Ameritrade for custody and brokerage services.

LIA also receives from TD Ameritrade certain additional economic benefits ("Additional Services") that may or may not be offered to any other independent investment Advisors participating in the program. Specifically, the Additional Services include Redtail CRM services, Morningstar data analytics services, Riskalyze analytics services and Orion performance reporting services. TD Ameritrade provides the Additional Services to LIA in its sole discretion and at its own expense, and LIA does not pay any fees to TD Ameritrade for the Additional Services. LIA and TD Ameritrade have entered into a separate agreement ("Additional Services Addendum") to govern the terms of the provision of the Additional Services.

LIA's receipt of Additional Services raises potential conflicts of interest. In providing Additional Services to LIA, TD Ameritrade most likely considers the amount and profitability to TD Ameritrade of the assets in, and trades placed for, LIA's Client accounts maintained with TD Ameritrade. TD Ameritrade has the right to terminate the Additional Services Addendum with LIA, in its sole discretion, provided certain conditions are met. Consequently, in order to continue to obtain the Additional Services from TD Ameritrade, LIA has an incentive to recommend to its Clients that the assets under management by LIA be held in custody with TD Ameritrade and to place transactions for Client accounts with TD Ameritrade. LIA's receipt of Additional Services does not diminish its duty to act in the best interests of its Clients, including to seek best execution of trades for Client accounts.

B. Compensation to Non – Advisory Personnel for Client Referrals

LIA does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

C. Solicitor Activities

LIA receives compensation for referring you to a third-party service provider, such as another adviser. The amount of compensation will be determined by the agreement between LIA and the third-party. We will act as the solicitor and deliver to you our solicitor's Disclosure Document at the time of the referral. Please note that payment of compensation to us and our representative for recommending a third-party creates a conflict of interest. Although we and our representatives commit to acting in your best interests, the existence of such compensation could encourage us to make an unnecessary referral or cause us to withhold information about an alternative option that doesn't provide equivalent compensation. We try to minimize this conflict by requiring any IAR making such a referral to provide details as to why the solicitor arrangement is in the best interest of the client.

From time to time, LIA will enter into an agreement with a third party to compensate the party for referring clients to LIA. If a client is introduced to LIA by a third party, LIA will pay that third party a referral fee in accordance with the requirements of securities law. Any such referral fee is paid solely from LIA's investment management fee, and does not result in any additional charge to the client. If the client is introduced to LIA by a solicitor, the solicitor provides the client with a copy of LIA's written disclosure brochure and a copy of the solicitor's disclosure statement containing the terms and conditions of the solicitation arrangement including compensation.

Item 15: Custody

LIA does not take custody of client funds or accounts at any time. Custody of client's accounts is held by the Client's custodian. Clients will receive account statements from their qualified custodian. Clients are urged to carefully review those statements and compare them to any report or statement provided by LIA and to report any discrepancy immediately to their investment adviser representative or the Chief Compliance Officer. Clients will also receive a fee invoice from LIA. When LIA directs the custodian to deduct its advisory fee from a client's account at the custodian, it will have written authorization from the client to do so.

Item 16: Investment Discretion

LIA has written investment discretion over its Discretionary WRAP Fee Program accounts. By executing the Discretionary Asset Management Services Agreement, clients grant investment discretion and authorize LIA and client's investment adviser representative to execute securities transactions, determine which securities are bought and sold, the total amount to be bought and sold, and the costs at which the transactions will be effected. Limitations cannot be imposed by the client in the form of specific constraints on any of these areas of discretion.

Item 17: Voting Client Securities (Proxy Voting)

LIA will not ask for, nor accept voting authority for Client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

Item 18: Financial Information

A. Balance Sheet

LIA neither requires nor solicits prepayment of more than \$1.200 in advisory fees for consulting services, per client, six months or more in advance and therefore does not need to include a balance sheet with this brochure.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither LIA nor its management has any financial condition that is likely to reasonably impair LIA's ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

LIA has not been the subject of a bankruptcy petition in the last ten years.

Item 19: Requirements for State Registered Advisers

LIA is a registered with the SEC. Therefore, this section is not applicable.

Item 1 Cover Page

Luken Investment Analytics, LLC

1894 General George Patton Drive, Suite 500

Franklin, TN 37067

615.550.5574

www.Luken.pro

Part 2A Appendix 1 of Form ADV

WRAP Fee Program Brochure

Version Date: July 17, 2018

This wrap fee program brochure provides information about the qualifications and business practices of Luken Investment Analytics, LLC. If you have any questions about the contents of this brochure, please contact us at 615.550.5574 or info@luken.pro. The information contained has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Luken Investment Analytics, LLC is also available on the SEC's website at www.adviserinfo.sec.gov

Luken Investment Analytics, LLC ("LIA") is a registered investment adviser with the Securities and Exchange Commission ("SEC"). Registration does not constitute an endorsement of the firm nor does it indicate that the adviser has attained a particular level of skill or ability. Information presented herein is for educational purposes only and does not intend to make an offer or solicitation for the sale or purchase of any specific securities, investments, or investment strategies. Investments involve risk. Be sure to first consult with a qualified financial adviser, legal and/or tax professional before implementing any securities, investment or investment strategies discussed herein.

PAST PERFORMANCE IS NOT INDICATIVE OF FUTURE RESULTS.

Luken Investment Analytics, LLC's CRD number is: 169008

Item 2 Material Changes

The material changes in this brochure from the last updating amendment of Luken Investment Analytics, LLC are described below. This list summarizes changes to policies, practices or conflicts of interests only.

No material changes

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Item 4 Services, Fees and Compensation

Discretionary WRAP Fee Program

Services

LIA provides discretionary investment advisory services to individual retail Clients. Clients pay the fee for this program monthly in advance. There are no additional commissions for accounts in this program. These services include some or all of the following; preparation of financial plans, explanation of investment concepts and strategies, asset allocation modeling, assistance with interpreting investment performance reports, broader assessments of the Clients overall financial situation, income needs and goals. The Clients goals, objectives and risk tolerance are matched with the model or models that are most suitable. Model allocations are reviewed quarterly and adjustments are made as necessary to realign with the model allocation. Clients can cancel the advisory services by giving 30 days written notice.

In the case where a client has a third party adviser, such third party adviser selects the particular model that that third party adviser believes is the most suitable, and LIA will manage the account on a discretionary basis using the model selected by the third party adviser.

Additional Fees

For individual Clients who pay us advisory fees, in addition to our advisory fee, you will also incur certain charges imposed by third parties which are not assessed or received by LIA or your investment adviser representative. Such charges include, but are not limited to, custodial fees, clearing firm fees, charges imposed directly by a mutual fund, index fund, or exchange traded fund purchased for the account which shall be disclosed in the fund's prospectus (e.g., fund management fees and other fund expenses), certain deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, brokerage account termination fees, annual account maintenance fees, SEC Fees, Reg Fees, exchange and floor fees, and other fees and taxes on brokerage accounts and securities transactions.

Compensation

Your investment adviser representative receives compensation as a result of your participation in this program. The amount of this compensation can be more than what they would receive if you participated in other programs or paid separately for investment advice, brokerage and other services. Therefore, your adviser has a financial incentive to recommend the Discretionary WRAP fee program over other programs and services. This creates a conflict of interest.

Discretionary WRAP fee program fees are billed monthly in advance and are debited directly from the Client account. The annual advisory fee can be a specific percentage fee but is most often based on a sliding schedule that ranges from 30 to 160 basis points (0.30% to 1.60%) that is negotiable between the Client and the Representative. This results in different fees for similar accounts. Based on your investment portfolio and investment strategy, the costs associated with an advisory account can exceed the commissions you would pay for brokerage services only.

Allocation Model Descriptions

LIA uses an innovative application of math to determine how a portfolio is diversified, all based on facts, rules and math. This global, macro-economic, top-down approach means that LIA looks at investments from around the world and filters them through a 3-stage (or 3-factor) process. The fact-based model looks at 1) Trend 2) Strength and 3) Risk of each asset class to determine how much, if any, goes into the portfolio.

Broad Scope Model

Broad Scope is a globally diversified, risk managed investment portfolio model designed for growth without regard for tax consequences. The Smart Diversification® portion of the portfolio will mathematically reallocate around the strategic core. Broad Scope is likely to have a reallocation 2 to 4 quarters per year, is not designed for inherent tax efficiency and can include alternative investment classes such as broad-based commodities index exposure, gold, any type of fixed income or equity as well as managed futures.

Income Model

Income is a globally diversified, risk managed investment portfolio model designed for income and growth with an emphasis on equity income. The Smart Diversification® portion of the portfolio will mathematically reallocate around the strategic core. Income is likely to have a reallocation 1 to 4 quarters per year, is not designed for inherent tax efficiency and can include alternative investment classes such as broad based commodities index exposure, gold, any type of fixed income or equity as well as managed futures.

Tax Aware Model

Tax Aware is a globally diversified, risk managed investment portfolio model designed for growth and engineered to minimize tax consequences. The Smart Diversification® portion of the portfolio will mathematically reallocate around the strategic core. Tax Aware is likely to have a reallocation 0 to 2 quarters per year, is designed for tax efficiency and has limited alternative investment class exposure compared to other portfolios.

Item 5 Account Requirements and Types of Clients

LIA provides investment advisory services to individual investors, families, high net worth investors, trusts, estates, retirement plans participants and private business owners. There is no minimum account size. All accounts are required to furnish accurate and complete suitability/profile information.

Item 6 Portfolio Manager Selection and Evaluation

Your investment adviser representative is your Portfolio Manager and will select the model, or models, best suited to meet your goals and objectives within your stated risk tolerance. Advisory Client investment strategies and their implementation are dependent upon our consulting with the Client and reviewing each client's current situation (objectives, goals, income, tax levels, and risk tolerance levels). Your investment adviser representative makes recommendations and suitability determinations as to which asset allocation models are best for their Clients based upon information provided by the Client. It is important that each Client provide accurate and complete responses to the questions asked by the Representative and that the Client promptly inform the Representative of any subsequent changes to the information provided. Clients cannot impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs.

Standards Used to Calculate Portfolio Manager Performance

LIA uses Orion performance reporting software and Association for Investment Management and Research ("AIMR") standards when measuring portfolio manager performance.

Review of Performance Information

Neither LIA nor a third-party reviews portfolio manager performance information. Information relating to their LIA accounts is fed into Orion's performance reporting software through a direct data feed from the custodian.

Related Persons

A supervised person of the firm serves as the portfolio manager for all wrap fee program accounts. This is a conflict of interest in that no outside adviser assesses the firm's management of the wrap fee program. However, the firm addresses this conflict by acting in its clients' best interest consistent with its fiduciary duty as sponsor and portfolio manager of the wrap fee program.

Performance-Based Fees and Side-By-Side Management

LIA does not accept performance-based fees or other fees based on a share of capital gains on, or capital appreciation of, the assets of a client. LIA does not engage in Side-By-Side Management.

Methods of Analysis and Investment Strategies / Material Risks Involved / Risks of Specific Securities Utilized

Methods of Analysis

LIA's methods of analysis include charting analysis, technical analysis and quantitative analysis.

Charting analysis involves the use of patterns in performance charts. LIA uses this technique to search for patterns used to help predict favorable conditions for buying and/or selling a security.

Technical analysis involves the analysis of past market data; primarily price and volume.

Quantitative analysis deals with measurable factors as distinguished from qualitative considerations, such as the character of management or the state of employee morale, the value of assets, the cost of capital, historical projections of sales, and so on.

Investment Strategies

LIA uses long term trading, short term trading and short-term purchase investment strategies.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Material Risks Involved

Risks Associated with Methods of Analysis

Charting analysis strategy involves using and comparing various charts to predict long and short term performance or market trends. The risk involved in using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. Past performance is not indicative of future performance.

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying *solely* on this method does not always work long term.

Quantitative Model Risk: Investment strategies using quantitative models can perform differently than expected as a result of, among other things, the factors used in the models, the weight placed on each factor, changes from the factors' historical trends, and technical issues in the construction and implementation of the models.

Risks Associated with Investment Strategies

LIA's use of short term trading holds greater risk and clients should be aware that there is a material risk of loss using any of those strategies.

Long term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, liquidity risk, market risk, and political/regulatory risk.

Short term trading risks include liquidity, economic stability and inflation, in addition to the long term trading risks listed above. Frequent trading, can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

Lack of Diversification presents risks when investments are concentrated and diversification is limited. There are no limits on position sizes.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

It should not be assumed that recommendations made in the future will be profitable or will equal the performance of the securities in the lists provided with the subscription.

Risk of Specific Securities Utilized

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below are not guaranteed or insured by the FDIC or any other government agency.

Mutual Funds: Investing in mutual funds carries the risk of capital loss and thus you can lose money investing in mutual funds. All mutual funds have costs that lower investment returns. They can be of bond "fixed income" nature (lower risk) or stock "equity" nature (mentioned below).

Equity: Investment in equities generally refers to buying shares of stocks in return for receiving a future payment of dividends and capital gains if the value of the stock increases. The value of equity securities fluctuates in response to specific situations for each company, industry market conditions and general economic environments.

Exchange Traded Funds (ETFs): Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). The price of Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed “electronic shares” not physical metal) are negatively impacted by several factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors. This is not meant to be an exhaustive list of all possible risks associated with ETF’s. Please ask your adviser for more information if you have further questions.

Bonds (Interest Rate Risk): Investing in bonds carries the risk that bond prices will fall as interest rates rise. By buying a bond, the bondholder has committed to receiving a fixed rate of return for a fixed period.

Cash and Cash Equivalents: Accounts can maintain significant cash positions from time to time. The client will pay the advisory fee based on the value of the account, including cash and cash equivalents. In this case, the account will forego investment opportunities and continue to hold cash positions until the model indicates that it is time for investment.

Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Voting Client Proxies

LIA will not ask for, nor accept voting authority for Client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

Item 7 Client Information Provided to Portfolio Managers

All client information material to managing the portfolio (including basic information, risk tolerance, sophistication level, and income level) is provided to their investment adviser representative. The representative will also have access to that information as it changes and is updated.

Item 8 Client Contact with Portfolio Managers

Clients are encouraged to work closely with their investment adviser representative and are encouraged to contact them freely.

Item 9 Additional Information

Disciplinary Information

There is no disciplinary information to report.

Other Financial Industry Activities and Affiliations

Gregory L. Luken, President and investment adviser representative of Luken Investment Analytics, is also a licensed insurance agent. From time to time, he will offer clients insurance advice or products.

LIA always acts in the best interest of the client.

Carri Sanford is also registered with Wiley Bros.-Aintree Capital, LLC, a broker/dealer and SEC registered investment adviser. She serves as a member of the compliance team. She is compensated based on an hourly rate for various compliance projects.

Conflicts of Interest

You should be aware that certain conflicts of interest exist in our management, distribution, fees, and oversight of the Program. Certain of these conflicts also apply to your adviser and other affiliates that support and receive compensation from the Program.

Your adviser will give advice or exercise investment responsibility and take such other action with respect to other accounts and affiliated accounts which differs from the advice given or the timing or nature of action taken with respect to your Model Portfolio account. Nothing in your agreement shall prevent or in any way limit or restrict your adviser from effecting transactions in securities for their own accounts or for the accounts of others.

LIA participates in the TD Ameritrade Institutional program. TD Ameritrade Institutional is a division of TD Ameritrade, Inc. ("TD Ameritrade") member FINRA/SIPC. TD Ameritrade is an independent [and unaffiliated] SEC-registered broker-dealer. TD Ameritrade offers to independent investment Advisors services which include custody of securities, trade execution, clearance and settlement of transactions. LIA receives some benefits from TD Ameritrade through its participation in the program.

LIA participates in TD Ameritrade's institutional customer program and LIA recommends TD Ameritrade to Clients for custody and brokerage services. There is no direct link between LIA's participation in the program and the investment advice it gives to its Clients, although LIA receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and

confirmations; research related products and tools; consulting services; access to a trading desk serving LIA participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to LIA by third party vendors. TD Ameritrade has also paid for business consulting and professional services received by LIA's related persons. Some of the products and services made available by TD Ameritrade through the program benefit LIA but do not benefit its Client accounts. These products or services assist LIA in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help LIA manage and further develop its business enterprise. The benefits received by LIA or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, LIA endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by LIA or its related persons in and of itself creates a potential conflict of interest and indirectly influences LIA's choice of TD Ameritrade for custody and brokerage services.

LIA also receives from TD Ameritrade certain additional economic benefits ("Additional Services") that may or may not be offered to any other independent investment Advisors participating in the program. Specifically, the Additional Services include Redtail CRM services, Morningstar data analytics services, Riskalyze analytics services and Orion performance reporting services. TD Ameritrade provides the Additional Services to LIA in its sole discretion and at its own expense, and LIA does not pay any fees to TD Ameritrade for the Additional Services. LIA and TD Ameritrade have entered into a separate agreement ("Additional Services Addendum") to govern the terms of the provision of the Additional Services.

LIA's receipt of Additional Services raises potential conflicts of interest. In providing Additional Services to LIA, TD Ameritrade most likely considers the amount and profitability to TD Ameritrade of the assets in, and trades placed for, LIA's Client accounts maintained with TD Ameritrade. TD Ameritrade has the right to terminate the Additional Services Addendum with LIA, in its sole discretion, provided certain conditions are met. Consequently, in order to continue to obtain the Additional Services from TD Ameritrade, LIA has an incentive to recommend to its Clients that the assets under management by LIA be held in custody with TD Ameritrade and to place transactions for Client accounts with TD Ameritrade. LIA's receipt of Additional Services does not

diminish its duty to act in the best interests of its Clients, including to seek best execution of trades for Client accounts.

TD Ameritrade Institutional is a division of TD Ameritrade, Inc. ("TD Ameritrade") member FINRA/SIPC. TD Ameritrade is an independent SEC-registered broker-dealer.

Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

LIA maintains a Code of Ethics to ensure securities transactions by our representatives are consistent with our fiduciary duty to our clients and to ensure compliance with legal requirements. A written copy of the Code of Ethics is available upon request. Among the specific areas addressed by our Code of Ethics are preclearance and reporting of personal securities transactions, insider trading prohibitions, conflicts of interest, gifts and entertainment reporting as well as political and charitable contributions.

Personal trading by our representatives is required to be conducted in compliance with all applicable laws and firm procedures. We allow our representatives to participate in aggregate trades to ensure that they do not receive a better execution than advisory accounts.

Review of Accounts

All advisory accounts are reviewed on an annual basis by the Chief Compliance Officer for suitability among other things. Accounts will be reviewed more frequently upon client request or upon material changes in the client's individual circumstances.

You will receive account statements at least quarterly from the custodian that includes such information as securities positions, the fair market values of investments in your portfolio, transactions and movement of funds. The account statement you receive from the custodian is your official account statement. Please compare the custodian account statement with any statement or report that you receive from your representative and promptly report any discrepancies to LIA's attention.

Client Referrals and Other Compensation

LIA receives compensation when we refer you to a third-party service provider, such as another adviser. The amount of compensation will be determined by the agreement between us and the third-party. We will act as the solicitor and deliver to you our solicitor's Disclosure Document at the time of the referral. Please note that payment of compensation to us and our representative for recommending a third-party creates a conflict of interest. Although we and our representatives commit to acting in your best interests, the existence of such compensation could encourage us to make an unnecessary referral or cause us to withhold

information about an alternative option that doesn't provide equivalent compensation. We try to minimize this conflict by requiring any IAR making such a referral to provide details as to why the solicitor arrangement is in the best interest of the client.

From time to time, Luken may enter into an agreement with a third party to compensate the party for referring clients to Luken. If a client is introduced to Luken by a third party solicitor, Luken may pay that solicitor a referral fee in accordance with the requirements of securities law requirements. Any such referral fee is paid solely from Luken's investment management fee, and does not result in any additional charge to the client. If the client is introduced to Luken by a solicitor, the solicitor provides the client with a copy of Luken's written disclosure brochure and a copy of the solicitor's disclosure statement containing the terms and conditions of the solicitation arrangement including compensation.

Financial Information

LIA has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy.

Item 10 Requirements for State Registered Advisers

This item is not applicable to SEC registered investment advisers.

This brochure supplement provides information about Gregory Lee Luken that supplements the Luken Investment Analytics, LLC brochure. You should have received a copy of that brochure. Please contact Gregory Lee Luken if you did not receive Luken Investment Analytics, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Gregory Lee Luken is also available on the SEC's website at www.adviserinfo.sec.gov.

Luken Investment Analytics, LLC
Form ADV Part 2B – Individual Disclosure Brochure
for

Gregory Lee Luken
Personal CRD Number: 1860579
Investment Advisor Representative

Luken Investment Analytics, LLC
1894 General George Patton Drive, Suite 500
Franklin, TN 37067
(615) 376-4588
greg@lukenanalytics.com

UPDATED: 3/16/2018

Item 2: Educational Background and Business Experience

Name: Gregory Lee Luken **Born:** 1962

Educational Background and Professional Designations:

Education:

Bachelor of Arts, English, Baylor University - 1987

Business Background:

| | |
|-------------------|---|
| 05/2013 - Present | Investment Advisor Representative & President Luken Investment Analytics, LLC |
| 11/1999 - Present | President Luken Investment Group, Inc. |
| 05/2003 – 10/2017 | Registered Representative/IAR SII Investments, Inc. |

Gregory Lee Luken is also licensed insurance producer and agent.

Item 3: Disciplinary Information

There is no disciplinary information to report.

Item 4: Other Business Activities

Gregory Lee Luken is President of Luken Investment Analytics, President of Luken Investment Group and a licensed insurance agent. From time to time, he will offer clients advice or products from this activity. Clients should be aware that these services pay a commission or other forms of compensation and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment advisor. Luken Investment Analytics, LLC always acts in the best interest of the client; including in the sale of

commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of Luken Investment Analytics, LLC in their outside capacity.

Item 5: Additional Compensation

Other than salary, annual bonuses, or regular bonuses, Gregory Lee Luken does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through Luken Investment Analytics, LLC.

Item 6: Supervision

Gregory Lee Luken is supervised by Carri Sanford, CCO. She reviews all client contracts and oversees the compliance for the advisory activities of the firm. Carri Sanford can be reached at the address and phone number on the cover page of this disclosure document or by emailing carri@lukenanalytics.com

Item 7: Requirements For State Registered Advisors

This disclosure is not required of SEC registered investment advisers.

Luken Investment Analytics, LLC
1894 General George Patton Drive, Suite 500 Franklin, Tennessee 37067
(615) 376-4588 carri@lukenanalytics.com

PRIVACY POLICY

Investment advisers are required by law to inform their clients of their policies regarding privacy of client information. We are bound by professional standards of confidentiality that are even more stringent than those required by law. Federal law gives customer the right to limit some but not all sharing of personal information. It also requires us to tell you how we collect, share, and protect your personal information.

TYPES OF NONPUBLIC PERSONAL INFORMATION (NPI) WE COLLECT

We collect nonpublic personal information about you that is either provided to us by you or obtained by us with your authorization. This can include but is not limited to your Social Security Number, Date of Birth, Banking Information and Financial Account Numbers and/or Balances, Sources of Income, Credit Card Numbers or Information. When you are no longer our customer, we may continue to share your information only as described in this notice.

PARTIES TO WHOM WE DISCLOSE INFORMATION

All Investment Advisers may need to share personal information to run their everyday business. In the section below, we list the reasons that we may share your personal information:

- For everyday business purposes – such as to process your transactions, maintain your account(s), or respond to court orders and legal investigations, or report to credit bureaus;
- For our marketing – to offer our products and services to you;
- For Joint marketing with other financial companies;
- For our affiliates' everyday business purposes – information about your transactions and experiences; or
- For non-affiliates to market to you.

Clients may opt out of sharing information for joint marketing to other financial companies, to our affiliates

and to non-affiliates. If you are a new customer we may begin sharing your information --on the day you sign our agreement. When you are no longer our customer, we may continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.

PROTECTING THE CONFIDENTIALITY OF CURRENT AND FORMER CLIENT'S INFORMATION

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law, including computer safeguards and secured files and building.

FEDERAL LAW GIVES YOU THE RIGHT TO LIMIT SHARING – OPTING OUT

Federal law allows you the right to limit the sharing of your NPI by "opting-out" of the following: sharing for affiliates' everyday business purposes – information about your creditworthiness; sharing with affiliates who use your information to market to you; or sharing with non-affiliates to market to you. State laws and individual companies may give you additional rights to limit sharing. Please notify us immediately if you choose to opt out of these types of sharing.

DEFINITIONS: Affiliates – companies related by common ownership or control. They can be financial and nonfinancial companies; Non-affiliates – companies not related by common ownership or control. They can be financial and nonfinancial companies; Joint marketing – a formal agreement between non-affiliated financial companies that together market financial products or services to you.

Please call if you have any questions. Your privacy, our professional ethics, and the ability to provide you with quality financial services are very important to us.