

# **Advisor Financial Services, Inc.**

## **Form ADV Part 2A**

### **Investment Advisor Brochure**

### **January 1, 2024**

This Brochure provides information about the qualifications and business practices of Advisor Financial Services Inc, formerly known as David C. Luck, CPA PC. If you have any questions about the contents of this Brochure, please contact us at 844-392-3400 or [Invest@Advisor.org](mailto:Invest@Advisor.org). 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.

Advisor Financial Services, Inc. is a registered investment adviser pursuant to the Investment Advisers Act of 1940. Our firm is registered with the Securities and Exchange Commission and is notice-filed in states where it is required to do so. Registration as an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Advisor provide you with information about which you determine to hire or retain an Advisor. Additional information is available from our offices located at

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Chatham, NY 12037  
518-392-3400

**Send all postal mail to:** 9307 Brook Road  
Toll Free 844-392-3400  
[Invest@Advisor.org](mailto:Invest@Advisor.org)

Glen Allen, Va 23060  
804-234-8600

A copy of this Brochure is available on our website <http://www.Advisor.org>

The information contained herein has been filed with the Securities and Exchange Commission, and the regulatory authorities in state where we have offices.

For more information about registered investment advisors and your rights,  
you may write to:

Securities and Exchange Commission  
100 F Street NE  
Washington DC 20549  
or visit their website at [www.SEC.Gov](http://www.SEC.Gov)

For questions regarding information contained  
in this brochure, please contact us.

## Item 2: Summary of Material Changes

Our schedule of fees and compensation has changed, see the new fee schedule on page 7

We will provide you with a new Brochure as necessary based on changes or new information, at any time, without charge. As stated, you may view a current version of this brochure at any time by visiting our website [www.Advisor.org](http://www.Advisor.org). Or you may receive your copy by contacting our office at 844-392-3400, or e-mail at [Invest@Advisor.org](mailto:Invest@Advisor.org). You should direct all inquiries to David C. Luck, CEO and Chief Investment Officer.

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## Item 4: Advisory Business

### Firm Description

Advisor Financial Services, Inc, formerly known as David C. Luck, CPA PC is an investment advisor providing investment advisory services on a discretionary basis for a variety of clients, including individuals, corporations, limited liability companies (LLCs), pension and profit sharing plans, trusts, estates, and charitable organizations. The Firm also provides clients with an opinion regarding the suitability of their current investment strategy as well as the investments selected to achieve those stated objectives without further management. In addition, the Firm also provides tax advice including income tax preparation, where suitable, and limited accounting and bookkeeping services. The Firm David C. Luck, CPA PC, was founded in 1995 as a Professional Corporation and immediately began offering financial planning and investment advice. On November 12, 2013, David Luck filed a new Certificate Incorporation, as Advisor Financial Services, Inc. which continues to offer the tax, investment and financial planning services. David C. Luck has been and continues to be the sole owner and officer of both corporations.

On January 1, 2015, Advisor Financial Services, Inc. opened a second office in Glen Allen Virginia and provides the same services at this location.

Advisor Financial Services, Inc. is registered with the SEC as an Investment Advisor

### Principal Owner:

The Firm's principal owner is David C. Luck, CEO and Chief Investment Officer.

### Types of Advisory Services

The Firm offers the following types of advisory services upon specific client request: financial planning, portfolio management, investment advices, tax preparation, tax planning and business consulting to its clients. Clients may include individuals, corporations, limited liability companies (LLCs), pension and profit sharing plans, trusts, estates, and charitable organizations.

### Investment Advisory Services

The Firm provides investment advisory services, defined as giving continuous advice to a client, and selecting investments for a client based on the individual needs of the client. Through personal discussions and or questionnaires, goals and objectives are established based on a client's particular circumstances. If necessary, the Firm may assists the client in developing a personal investment policy, and then create and manage the client's portfolio based on that policy. The interview(s) may also include, but are not limited to, a discussion of the goals of the client, use of written questionnaires, review of client's current financial position, income tax effects, tolerance to risk, family specifics, values and health information as well as a discussion of employer sponsored plans, where applicable. Each client is advised that it will remain his/her responsibility to promptly notify the Firm of any changes to their respective financial situation and consequently, their investment objectives. The Firm uses standardized models and assigns each client to a model based on the clients investment objectives or policy. Investment strategies generally include long-term and short-term purchases depending upon the individual needs of the client. The Firm uses asset allocation, or spreading investments among a number of asset classes and sectors (domestic stocks vs. foreign stocks; large cap stocks vs. small cap stocks; corporate bonds vs. government securities) for most client portfolios.

The Firm offers selective financial planning services at the clients specific request, which may include a review of all aspects of a client's current financial situation, including the following components: cash management, risk management, insurance, education funding, goal setting, retirement planning, estate and charitable gift planning, tax planning, and capital needs planning. The Firm meets with the client to review risk tolerance, financial goals and objectives, and time horizons. Additional meetings may include a review of additional financial information; sources of income, assets owned, existing insurance, liabilities, wills, trusts, business agreements, tax returns, investments, and personal and family obligations.

Financial planning services requested by the client may be comprehensive, or may focus on certain components. Clients understand that when The Firm is engaged to address only certain components, the client's overall financial and investment issues may not be taken into consideration.

### **Tailored Relationships**

The Firm may, at the clients specific request, tailor investment advisory services to the individual needs of the client. The goals and objectives for each client are documented. Clients are allowed to impose restrictions on the investments in their account. The Firm may, at it's sole discretion, accept any reasonable limitation or restriction to its discretionary authority on the account placed by the client. All limitations and restrictions placed on accounts must be presented to the Firm in writing.

### **Wrap Fee Programs**

The Firm does not participate in any Wrap Fee Programs.

### **Client Assets**

As of December 31, 2022, The Firm manages approximately \$31.3 million in assets that are managed on a discretionary basis; approximately \$1.8 million in assets that are managed on a non-discretionary basis; for a total of approximately \$33. million in total assets under management.

## Item 5: Fees and Compensation

### Compensation

The Firm bases its fees on a percentage of assets under management, hourly charges, and fixed fees. The Firm's fee schedules are described below.

### Compensation – Investment Advisory Services

Applicable fees are rendered according to an agreed schedule. For the vast majority of its clients, the Firm levies a fee that is set as a percentage of assets under management with a minimum fee of \$86 per year. This investment advisory fee shall be pro-rated and paid quarterly, in advance, based upon the value of the assets at 6:00 pm eastern time on the last day business day of the calendar quarter.

### Schedule of Management Fees:

#### Assets Under Management Annual Fee (effective January 1, 2023)

The Advisor has three methods of charging Investment Advisory fees: General Asset Management fees, Equity Asset Management fees and Hourly fees. Certain clients may have arrangements whereby their rates differ from the current published rates shown. These rates reflect a difference in the nature or circumstances of the services provided, or in the fee schedule updates since the client first engaged the Firm's services.

General Assets include cash, money markets, bonds, mutual funds, and electronically traded funds(ETFs); Equity Assets include direct investment in shares of public traded companies which are managed on behalf of the client; Hourly fees are charged for financial planning and short term engagements.

#### A. Fees for General Asset Management:

- 1 Minimum Fee \$86/year
- 2 \$100 to \$250,000 - Fee of 1.0%
- 3 \$250,001 to \$500,000- Fee of 0.85%
- 4 \$500,001 to \$1,000,000 - Fee of 0.70%
- 5 \$1,000,001 and up - Fee of 0.5%

#### B. Fees for Equity Asset Management:

- 1 Minimum Fee \$86/year
- 2 \$100 to \$250,000 - Fee of 1.5%
- 3 \$250,001 to \$500,000- Fee of 1.25%
- 4 \$500,001 to \$1,000,000 - Fee of 1.0%
- 5 \$1,000,001 and up - Fee of 0.75%

C. Percentages in A. and B. above are on an annual basis, billed quarterly in advance. Fees are based on the value in the account on the last day of the previous quarter. New accounts are billed on a pro-rata basis and closed accounts may receive a pro-rata refund if requested.

An investment advisory agreement will be provided to each client prior to, or simultaneously, with the execution of any formal documents required by the custodian, TD Ameritrade, Inc., Charles Schwab & Co., Inc. or its successor, Furthermore, the client along with the Advisor will sign and date the investment advisory agreement with a copy provided to the client and a copy of the original maintained in his/her file in accordance with the Firm's paperless office policy. Clients authorize the Firm to directly debit fees from client accounts for all fees for both

investment and other firm services.

After information is obtained and at the discretion of the client and the consent of the advisor, the Firm may also provide investment advice on an hourly basis at a negotiable rate of not more than \$325 per hour. The Firm may also charge project fees which are determined by the breath, depth and nature of the specific project. This project is confined to investment advice, income tax preparation, insurance review, and estate planning.

### **Compensation – Financial Planning Services**

The Firm charges a minimum fee of \$1,000 for comprehensive financial planning engagements. This fee may be reduced or waived by agreement of both the Firm and the Client.

### **Calculation and Payment**

The Firm will generally calculate fees, in advance, on a quarterly basis, based on the value of the account(s) at the close of business on the last day of the calendar quarter. Accounts initiated or terminated during a calendar quarter will be charged a prorated fee. Upon termination of any account, any prepaid, unearned fees will be promptly refunded upon request, and any earned, unpaid fees will be due and payable.

### **Agreement Terms**

Either party may terminate the agreement upon written notice. In the event of cancellation, The Firm shall complete the outstanding commitments made on behalf of the client. However, the Firm shall not make any further commitments or be otherwise responsible for any acts on behalf of the client. Any unused fee shall be refunded to the client upon request.

### **General Information on Compensation and Other Fees**

In special circumstances, fees, account minimums and payment terms are negotiable depending on the client's unique situation – such as the size of the aggregate related party portfolio size, family holdings, low cost basis securities, or certain passively advised investments and pre-existing relationships with clients. Certain clients may pay more or less than others depending on the amount of assets, type of portfolio, the time involved, the degree of responsibility assumed, complexity of the engagement, special skills needed to solve problems, and or the application of experience and knowledge of the client's situation. Lower fees for comparable services may be available from other sources.

The fee charged is calculated as described above and is not charged on the basis of a share of capital gains upon or capital appreciation of the funds or any portion of the funds of an advisory client.

The Firm's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third party investments and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus.



Such charges, fees and commissions are exclusive of and in addition to the Firm's fee, and the Firm shall not receive any portion of these commissions, fees, and costs. Neither the Firm nor any of its supervised persons (employees) accept compensation for the sale of securities or other investment products.

All fees paid to the Firm for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and ETFs. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other expenses, and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge.

A client could invest in a mutual fund or sub-account directly, without the services of the Firm. In that case, the client would not receive the services provided by the Firm which are designed, among other things, to assist the client in determining which mutual funds are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and the fees charged by the Firm to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided. Clients should note that similar advisory services may (or may not) be available from other registered investment advisors for similar, greater or lower fees.

## **Item 6: Performance - Based Fees and Side-by-Side Management**

Neither the Firm nor any of its Supervised Persons (employees) accepts performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

The Firm does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the advisor to recommend an investment that may carry a higher degree of risk to the client, a risk the client may not understand and an investment that is suitable for the client.

Side by Side Management would exist if we managed some accounts on a performance basis and others on another fee basis. Since we do not allow performance-based fees, this is not applicable to our Firm.

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

### **Types of Clients**

As described in Item 4, the Firm's clients include individuals, corporations, limited liability companies (LLCs), pension and profit sharing plans, trusts, estates, and charitable organizations.

### **Account Minimums**

The Firm does not require a minimum account size for investment advisory clients. We firmly believe that all clients, regardless of assets, deserve a good advice.

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

### **Methods of Analysis**

The Firm may employ the following security analysis methods: Charting; fundamental analysis; technical analysis; and cyclical analysis. The Firm uses the following main sources of information including, financial newspapers and magazines, inspections of corporate activities, research materials prepared by others, corporate rating services, annual reports, prospectuses, filings with the Securities and Exchange Commission (SEC), and company press releases. Other sources of information that the Firm may use include information from investment managers, financial service companies, data base companies, financial journals, various news and commentary subscriptions and government sources, Morningstar mutual fund information, Morningstar stock information, TD Ameritrade, Inc., Charles Schwab & Co. Inc., and the Internet at large.

### **Investment Strategies**

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time. Each client signs a Model Portfolio Choice and Risk Tolerance document that outlines their desired investment strategy. Each client is advised that it remains his/her responsibility to promptly notify the Firm of any changes to their acceptable level of risk tolerance, respective financial situation and consequently, their investment objectives.

### **Risk of Loss**

Investing in securities involves risk of loss that clients should be prepared to bear. All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

*Interest-rate Risk:* Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.

*Market Risk:* The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.

*Inflation Risk:* When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.

*Currency Risk:* Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.

*Reinvestment Risk:* This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.

*Business Risk:* These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.

*Liquidity Risk:* Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.

*Financial Risk:* Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

### **Initial Public Offerings**

The Firm typically does not participate on behalf of its clients in initial public offerings.

## **Item 9: Disciplinary Information**

The Firm does not have any disciplinary information to disclose.

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

### **Financial Industry Activities – Broker-Dealer**

The Firm is not registered as a broker-dealer, and none of its management persons are registered representatives of a broker-dealer.

### **Financial Industry Activities – Futures and Commodities**

Neither the Firm nor any of its management persons is registered as (or associated with) a futures commissions merchant, commodity pool operator, or a commodity trading advisor.

### **Other Investment Advisors**

The Firm may, at its discretion, recommend other investment advisors for its clients on a case by case basis. If it recommends another investment advisor the client and the Firm will review the reasons for the recommendation and if there is a fee received by the Firm, it will be clearly outlined in writing and the duties of both the Firm and other investment advisors will be explained in writing.

## Item 11: Code of Ethics

### Code of Ethics

The Firm employees must comply with a Code of Ethics and Statement for Insider Trading. The Code describes the Firms' high standard of business conduct, and **fiduciary duty** to its clients. The Code's key provisions include:

- Statement of General Principles
- Policy on and reporting of Personal Securities Transactions
- A prohibition on Insider Trading
- Restrictions on the acceptance of significant gifts
- Procedures to detect and deter misconduct and violations
- Requirement to maintain confidentiality of client information

David C. Luck reviews all trades. These reviews ensure that personal trading does not affect the markets, and that clients of the Firm receive preferential treatment.

The Firm's employees must acknowledge the terms of the Code of Ethics at least annually. Any individual not in compliance with the Code of Ethics may be subject to termination. Clients and prospective clients can obtain a copy of The Firm's Code of Ethics by contacting the Firm at 844-392-3400 or via email at [Invest@Advisor.org](mailto:Invest@Advisor.org).

## Item 12: Brokerage Practices

### Research and Other Soft Dollar Benefits

The Firm does not receive formal soft dollar benefits other than execution from broker/dealers in connection with client securities transactions. See disclosure below in “Directed Brokerage – Other Economic Benefits”.

### Brokerage for Client Referrals

The Firm may receive client referrals from broker/dealers. All such referrals never involve compensation of any kind in either direction but are solely for the advantage of the client.

### Factors Considered in Selecting Broker Dealers for Client Transactions

The Firm generally requires that clients open one or more custodian accounts in their own name at TD AMERITRADE Institutional. TD AMERITRADE Institutional is a division of TD AMERITRADE, INC. (“TD AMERITRADE”) member FINRA/SIPC. TD AMERITRADE is an unaffiliated SEC-registered broker-dealer and FINRA member. The client will enter into a separate agreement with TD AMERITRADE to custody the assets. The Firm also requires that clients grant the Firm limited power of attorney to execute client transactions through TD AMERITRADE. NOTE: October 6, 2020, Schwab completed the purchase of TD Ameritrade and all of its holdings. While the sale was completed in 2020, the change of letterhead, website and other client facing information is expected to be completed late summer of 2023.

The Firm is independently owned and operated, and unaffiliated with TD AMERITRADE. TD AMERITRADE may charge commissions (ticket charges) for executing our transactions. We do not receive any part of these separate charges. TD AMERITRADE may provide us with access to their institutional trading and custody services, which are typically not available to TD AMERITRADE retail investors. TD AMERITRADE’s services include brokerage custody, research and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment. The Firm’s clients who choose to have their assets held at TD AMERITRADE will not be charged separately for custody but are compensated by account holders through commissions or other transaction-related fees or securities trades that are executed through TD AMERITRADE. The Firm considers several factors in recommending TD AMERITRADE to clients. Factors that the Firm may consider may include ease of use, reputation, service execution, pricing and financial strength. The Firm may also take into consideration the availability of the products and services received or offered (detailed below).

TD AMERITRADE offers to independent investment advisors, services which include custody of securities, trade execution, technology and software applications, research, reporting, clearance and settlement of transactions. The Firm receives some benefits from TD AMERITRADE through its participation in the program. The Firm may receive soft dollar benefits through TD Ameritrade. Soft dollar practices are arrangements under which approved products ie. investment research, are obtained by the Firm through TD Ameritrade in exchange for directing client brokerage transactions. The Firm does purchase research software and other client tools and uses such software and tools to improve the ability of the firm to offer all clients, a better experience and a better investment result.

NOTE: TD AMERITRADE INC. has been purchased by CHARLES SCHWAB & CO., INC. The transaction will be completed on September 5, 2023 at which time, TD Ameritrade will no longer exist as a separate company.

## Soft-Dollar Arrangements

Generally, in addition to a broker's ability to provide "best execution," we may also consider the value of "research" or additional brokerage products and services a broker-dealer has provided or may be willing to provide. This is known as paying for those services or products with "soft dollars." Because many of the services or products could be considered to provide a benefit to the firm, and because the "soft dollars" used to acquire them are client assets, the firm could be considered to have a conflict of interest in allocating client brokerage business: it could receive valuable benefits by selecting a particular broker or dealer to execute client transactions and the transaction compensation charged by that broker or dealer might not be the lowest compensation the firm might otherwise be able to negotiate. In addition, the firm could have an incentive to cause clients to engage in more securities transactions than would otherwise be optimal in order to generate brokerage compensation with which to acquire products and services.

The Firm's use of soft dollars is intended to comply with the requirements of Section 28(e) of the Securities Exchange Act of 1934. Section 28(e) provides a "safe harbor" for investment managers who use commissions or transaction fees paid by their advised accounts to obtain investment research services that provide lawful and appropriate assistance to the manager in performing investment decision-making responsibilities. As required by Section 28(e), the firm will make a good faith determination that the amount of commission or other fees paid is reasonable in relation to the value of the brokerage and research services provided. That is, before placing orders with a particular broker, we generally determine, considering all the factors described below, that the compensation to be paid to TD Ameritrade is reasonable in relation to the value of all the brokerage and research products and services provided by TD Ameritrade. In making this determination, we typically consider not only the particular transaction or transactions, and not only the value of brokerage and research services and products to a particular client, but also the value of those services and products in our performance of our overall responsibilities to all of our clients. In some cases, the commissions or other transaction fees charged by a particular broker-dealer for a particular transaction or set of transactions may be greater than the amounts another broker-dealer who did not provide research services or products might charge.

*Research and Brokerage Products and Services.* "Research" products and services we may receive from broker-dealers may include economic surveys, data, and analyses; financial publications; recommendations or other information about particular companies and industries (through research reports and otherwise); and other products or services (e.g., computer services and equipment, including hardware, software, and data bases) that provide lawful and appropriate assistance to the firm in the performance of its investment decision-making responsibilities. Consistent with Section 28(e), brokerage products and services (beyond traditional execution services) consist primarily of computer services and software that permit us to effect securities transactions and perform functions incidental to transaction execution. We generally use such products and services in the conduct of our investment decision-making generally, not just for those accounts whose commissions may be considered to have been used to pay for the products or services. 18

These products or services may assist the Firm in managing and administering Client accounts, including accounts not maintained at TD AMERITRADE. Other services made available by TD AMERITRADE are intended to help the Firm manage and further develop its business enterprise. The benefits received by the Firm 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, the Firm endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by the Firm or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Firm's choice of TD AMERITRADE for custody and brokerage services.

### **Directed Brokerage**

The Firm will not allow clients to direct the Firm to use a specific broker-dealer to execute transactions. Clients must use the broker-dealers that the Firm has a relationship with. Not all investment advisors require their clients to trade through specific brokerage firms. By requiring clients to use TD AMERITRADE, the Firm believes we may be able to more effectively manage the client's portfolio, achieve favorable execution of client transactions, and overall lower the costs to the portfolio. Since we require most of our clients to maintain their accounts with TD AMERITRADE, it is also important for clients to consider and compare the significant differences between having assets custodied at another broker-dealer, bank or other custodian prior to opening an account with us. Some of these differences include, but are not limited to; total account costs, trading freedom, transaction fees/commission rates, and security and technology services. By requiring clients to use TD AMERITRADE, the Firm believes we may be able to more effectively manage the client's portfolio, achieve favorable execution of client transactions, and overall lower the costs to the portfolio.

### **Aggregation and Allocation of Transactions**

In some cases, the Firm will recommend the purchase or sale of the same security for multiple clients at the same time. The Firm, at its discretion, may aggregate any client transactions in mutual fund or other securities and allocate shares of these transactions to specific Client accounts. The benefit of Aggregation of a trade is that all clients receive the same purchase price for a specific security or mutual fund and in theory, a most time efficient execution. Client accounts are individually reviewed and transaction costs are not saved by aggregating orders in almost all circumstances in which the Firm arranges transactions.

In some cases, the Firm may combine purchase and sale orders for all clients with the same order. The Firm will generally allocate the proceeds arising out of those transactions (and the related transactions expenses) on an average price basis among the various participants in the transactions. The Firm believes that by combining orders in this way it will be advantageous to all participants. However, the average price could be less advantageous to a particular client than if that client had been the only account effecting the transaction or had completed its transaction before the other participants.

The Firm may also place orders for the same security for different clients at different times and in different relative amounts due to, among other things, differences in investment objectives, cash availability, size of order, and practicability of participating in "block" transactions. The level of participation by different clients in the same security may also be dependent upon other factors relating to the suitability of the security for the particular client.

There are circumstances when some of a client's transactions in the security may not be aggregated with other clients. The Firm has adopted policies and procedures intended to ensure that our trading allocations are fair to all of our clients.

In addition, the Firm and/or our related persons may buy or sell specific securities for our own accounts that are not deemed appropriate for another client at the time, based on personal investment considerations that differ from the considerations on which decisions as to investments for the client are made. Where execution opportunities for a particular security are limited, the Firm attempts in good faith to allocate such opportunities among clients in a manner that is equitable to all our clients over time.

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

### **Reviews**

After meeting with the client and establishing an account with an agreed upon suitable investment strategy, David Luck reviews the portfolios on an going basis, and accounts are selected for review based upon asset allocation, account size, asset class and the weighting of each individual holding. Triggering factors include changes in a client's situation, in the economy, geopolitical occurrences, newly released corporate data, and general market conditions. The Firm encourages its clients to meet with their David Luck or their portfolio manager at least once each year or when their situation changes.

### **Reporting**

Clients receive reports detailing portfolio positions, cash balances, transaction details, income and expenses on at least a quarterly basis from TD AMERITRADE. Clients are also able to access their accounts online through TD AMERITRADE. Contact our firm or TD AMERITRADE for more information on how to achieve this. In addition to the above, the Firm, upon request, may email or mail reports to clients detailing their portfolio positions, cash balances and top holdings. These reports are also available upon request.

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

### **Other Compensation**

The Firm does not receive any formal economic benefits (other than normal compensation) from any firm or individual for providing investment advice.

### **Other Compensation – Brokerage Arrangements**

See disclosure in Item 12 regarding compensation, including economic benefits received in connection with giving advice to clients.

### **Compensation – Client Referrals**

The Firm does not make or accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.



## Item 15: Custody

### **Custody – Fee Debiting and Moving Money**

The Firm has two forms of custody. 1) Clients may authorize the Firm (in the client agreement) to debit fees directly from the client's account at the broker dealer, bank or other qualified custodian(s). Client investment assets will be held with a custodian agreed upon by the client and the Firm. The custodian is advised in writing of the limitation of the Firm's access to the account. The custodian sends a statement to the client, at least quarterly, indicating all amounts disbursed from the account including the amount of advisory fees paid directly to the Firm. 2) The Client may authorize the firm to transfer money to or from the Client's local bank account via wires or ACH transactions. The firm maintains a list of all such relationships for inspection by regulatory agencies.

### **Custody – Account Statements**

As described above and in Item 13, clients receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. Clients are urged to carefully review such statements and compare such official custodial records to the account statements or other reports that the Firm provides. The Firm statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

## Item 16: Investment Discretion

The Firm usually receives discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment policy for the particular client account if one exists. Discretionary Authority for Trading and Limited Power of Attorney through the investment management agreement, the Firm may accept limited power of attorney to act on a discretionary basis on behalf of clients. A limited power of attorney allows the Firm to execute trades on behalf of clients. When such limited powers exist between the Firm and the client, the Firm has the authority to determine, without obtaining specific client consent, both the amount and type of securities to be bought to satisfy client investment policy as interpreted and understood by the Firm. Additionally, the Firm may, at the Firm's sole discretion, accept any reasonable limitation or restriction to such authority on the account placed by the client. All limitations and restrictions placed on accounts must be presented to the Firm and agreed to by the Firm in writing. However, the Firm consults with the client prior to each trade to obtain concurrence if discretionary trading authorization has not been given.

Discretionary investment is deemed essential by the Firm in order to make best use of resources in trading. Occasionally, the firm will have a limited time frame with which to purchase a specific investment. If the Firm were required to contact every client prior to placing a trade in the clients account, there would not be enough time in the day, and the quality, price or availability of our management advice would be diminished.

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

### **Proxy Voting**

The Firm, with Clients authorization, be designated to receive and vote on issues relating to securities held in clients accounts. Client understands that the Firm may vote as the Firm chooses in that it feels the vote is in the best interest of the client. The Firm will disclose and refrain from Voting on any matters where there is a remote potential for the Firm to have a conflict of interest with the client. In the event that the Client does not provide written authorization for the firm to receive proxies or other solicitations, the firm will not accept or have the authority to vote said client securities. The Firm will not be deemed have proxy voting authority solely as a result of providing advice or information about a particular proxy vote to a client. Clients who have not designated the Firm as recipient, will receive their proxies or other solicitations directly from their custodian or a transfer agent.

### **Mutual Funds**

The investment advisor that manages the assets of a registered investment company (i.e., mutual fund) generally votes proxies issued on securities held by the mutual fund.

### **Class Actions**

The Firm does not instruct or give advice to clients on whether or not to participate as a member of class action lawsuits and will not automatically file claims on the client's behalf. However, if a client notifies us that they wish to participate in a class action, we will provide the client with any transaction information pertaining to the client's account needed for the client to file a proof of claim in a class action.

## **Item 18: Financial Information**

### **Financial Condition**

The Firm 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 proceeding.

The Firm is not required to provide a balance sheet; The Firm does not require prepayment of fees of more than \$500 per client and six months or more in advance.

**Advisor Financial Services, Inc.**  
**Form ADV Part 2B**  
**Investment Advisor Brochure Supplement**  
**Supervisor: David C. Luck**

January 01, 2020

This brochure supplement provides information about the Firm's Supervised Persons that supplements the Advisor Financial Services, Inc.'s brochure. You should have received a copy of that brochure. Please contact David C. Luck, if you did not receive Advisor Financial Services Inc's brochure or if you have any questions about the contents of this supplement.

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A copy of this Brochure is available on our website <http://www.Advisor.org>

The information contained herein has been filed with the Securities and Exchange Commission and can be viewed at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

Registration of an Investment Adviser does not imply any level of skill or training. 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.

The information in this brochure is current as of the date below and is subject to change at our discretion.

For questions regarding information contained in this brochure, please contact us.

## Educational Background and Business Experience

The Firm requires that advisors in its employ have earned a four-year college degree and/or have a minimum of five years investment related experience.

### Supervised Persons

**David C. Luck, CPA CFP, Born 1963**

#### Preceding 5 years Business Experience:

Advisor Financial Services, Inc. (2013 - Present)

David C. Luck, CPA PC (1995 – Present)

President, Chief Investment Officer, Portfolio Manager

#### Educational Background:

Anderson University - Bachelor of Business Administration (1988)

University of Phoenix - Master's of Business Administration

Emphasis: Financial Planning (1993)

CPA - Certified Public Accountant (1995)

CFP® - Certified Financial Planner (2017)

(see minimum qualifications required for professional designation)

### Professional Designations Minimum Qualifications Required

**CPA - Certified Public Accountant :** CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination. In order to maintain a CPA license, states generally require the completion of 24-40 hours of continuing professional education (CPE) each year (or 80 hours over a two year period or 120 hours over a three year period). Additionally, all American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous *Code of Professional Conduct* which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services. The vast majority of state boards of accountancy have adopted the AICPA's *Code of Professional Conduct* within their state accountancy laws or have created their own.

**CFP - Certified Financial Planner®:** CFP® professionals must pass the comprehensive CFP® Certification Examination, pass CFP Board's Fitness Standards for Candidates and Professionals Eligible for Reinstatement, agree to abide by CFP Board's Code of Ethics and Professional Responsibility and Rules of Conduct which put clients' interests first and comply with the Financial Planning Practice Standards which spell out what clients should be able to reasonably expect from the financial planning engagement.

## **Disciplinary Information**

Neither The Firm nor any Supervised Persons have been involved in any activities resulting in a disciplinary disclosure.

## **Other Business Activities**

The Firm's Supervised Persons may engage in other outside business activities as long as they are not in conflict or competition with the Firm's activities and policies.

As disclosed in Form ADV Part 2A Item 5 – Fees and Compensation, neither The Firm nor any Supervised Persons receive commissions, bonuses or other compensation based on the sale of securities or other investment products.

## **Additional Compensation**

No Supervised Person receives any formal economic benefit outside of regular salaries or bonuses related to amount of sales, client referrals or new accounts.

## **Supervision**

### **Supervision**

David C. Luck supervises all persons named in this Form ADV Part 2B Investment Advisor Brochure Supplement. David C. Luck supervises these persons by holding regular staff, investment and other ad hoc meetings. In addition, David C. Luck regularly reviews client reports, emails, and trading, as well as employees' personal securities transaction and holdings reports. David C. Luck may be reached at 844-392-3400.