

JNF Advisors, Inc.  
10350 Ormsby Park Place  
Louisville, KY 40223  
866.667.0563  
March 20, 2015

This Brochure provides information about the qualifications and business practices of JNF Advisors, Inc. If you have any questions about the contents of this Brochure, please contact us at (502)587-3809. 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.

JNF Advisors, Inc. is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about JNF Advisors, Inc. also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Material Changes**

On July 28, 2010, the United State Securities and Exchange Commission published “Amendments to Form ADV” which amends the disclosure document that we provide to clients as required by SEC Rules. This Brochure is dated March 26, 2014.

The material changes to the brochure are as follows:

- The JNF Dynasty Liquid Alternatives Portfolio was launched in October, 2014 to which JNF Advisors, Inc. serves as investment advisor. This Portfolio has been added to Item 4, 5, 13 and 16 below..

We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting Missy Pulliam at (502)587-3809 or [mpulliam@jeffnat.com](mailto:mpulliam@jeffnat.com).

Additional information about JNF Advisors is also available via the SEC’s web site [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

### **Item 3 -Table of Contents**

|  |   |
|--|---|
| Item 1 – Cover Page.....   | 1 |
| Item 2 – Material Changes .....  | 2 |
| Item 3 -Table of Contents .....  | 3 |
| Item 4 – Advisory Business .....   | 4 |
| Item 5 – Fees and Compensation .....                                       | 4 |
| Item 6 – Performance-Based Fees and Side-By-Side Management .....          | 5 |
| Item 7 - Types of Clients .....  | 5 |
| Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss ..... | 5 |
| Item 9 – Disciplinary Information .....                                    | 5 |
| Item 10 – Other Financial Industry Activities and Affiliations .....       | 5 |
| Item 11 - Code of Ethics .....   | 5 |
| Item 12 – Brokerage Practices .....  | 6 |
| Item 13 – Review of Accounts .....   | 6 |
| Item 14 – Client Referrals and Other Compensation.....                     | 6 |
| Item 15 – Custody .....  | 6 |
| Item 16 – Investment Discretion.....                                       | 6 |
| Item 17 - Voting Client Securities .....                                   | 6 |
| Item 18 - Financial Information.....                                       | 7 |
| Item 19 - Business Continuity Plan.....                                    | 7 |
| Item 20 - Information Security.....  | 7 |

## Item 4 - Advisory Business

JNF Advisors, Inc. (“JNF Advisors”) was formed in 2006. Its main activity is serving as an investment adviser to the JNF SSgA Sector Rotation Portfolio, JNF SSgA Tactical Allocation Portfolio, JNF Dynasty Liquid Alternatives Portfolio, and JNF SSgA Retirement Income Portfolio, (each a “Portfolio” and collectively the “Portfolios”) each of which is an underlying fund offered in the variable annuities issued by JNF Advisor’s affiliate, Jefferson National Life Insurance Company (“Jefferson National Life”), and distributed by its affiliate, Jefferson National Securities Corporation. Beginning on or about May 1, 2015, the Portfolios will also be offered in variable annuities offered by Jefferson National Life Insurance Company of New York (“JNL NY”), a subsidiary of Jefferson National Life. Jefferson National Life and JNL NY each establishes Separate Accounts, registered as unit investment trusts under the Investment Company Act of 1940, as amended, to hold the assets that underlie the annuities.

Further, JNF Advisors sub-advises all investment management functions related to these Portfolios to an unaffiliated registered investment adviser.

For purposes of Rule 3a-4, JNF Advisors is also the Sponsor for certain asset allocation model programs offered by its affiliate, Jefferson National Life (the “AAM Program”). JNF Advisors has engaged a third party to recommend the model portfolios and the underlying funds in the model portfolios. The AAM Program models are only offered to customers who are separately advised by an unaffiliated investment adviser or registered representative

Jefferson National Financial Corp. owns 100% of the stock of JNF Advisors.

JNF Advisors has approximately \$135,110,028 under management, as of 12/31/2014.

## Item 5 - Fees and Compensation

|   |       |
|---|-------|
| Annual sponsor fee received from AAM Program Participants     | 0.50% |
| JNF Advisors, Inc, Management Fee Schedule for JNF Portfolios |       |
| JNF SSgA Tactical Rotation                                    | 0.65% |
| JNF SSgA Sector Rotation                                      | 0.65% |
| JNF Dynasty Liquid Alternatives                               | 0.50% |
| JNF SSgA Retirement Income                                    | 0.50% |

## **Item 6 – Performance-Based Fees and Side-By-Side Management**

JNF Advisors does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

## **Item 7 – Types of Clients**

JNF Advisors provides investment advice primarily to investment companies. While individual annuity owners may participate in the AAM Program, JNF Advisors requires these individuals to be represented by another financial professional who contractually agrees to provide the customer facing requirements in Rule 3a-4.

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

JNF Advisors sub-advises asset management to unaffiliated advisers. Investing in securities involves risk of loss that clients should be prepared to bear.

## **Item 9 – Disciplinary Information**

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

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

JNF Advisors has arrangements that are material to its advisory business or its clients with a related person who is a broker-dealer (Jefferson National Securities Corporation), and Jefferson National Life and JNL NY, each of which establishes separate accounts registered as unit investment trusts.

Following are the officers of JNF Advisors. Mr. Hawley is also a registered representative of Jefferson National Securities Corporation, a JNF Advisors affiliate.

Craig Hawley, General Counsel, Secretary and Chief Compliance Officer  
Joseph Vap, Chief Financial Officer

## **Item 11 – Code of Ethics**

JNF Advisors has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at JNF Advisors must acknowledge the terms of the Code of Ethics annually and when amended.

JNF Advisors clients or prospective clients may request a copy of the firm's Code of Ethics by contacting Missy Pulliam at (502)587-3809 or [mpulliam@jeffnat.com](mailto:mpulliam@jeffnat.com).

## **Item 12 – Brokerage Practices**

We do not have any affiliation with select Broker Dealers. The sub-advisers JNF Advisors hire are monitored.

## **Item 13 – Review of Accounts**

JNF Advisors conducts no review of client accounts. Its primary activity is serving as an investment adviser to JNF SSgA Sector Rotation Portfolio, JNF SSgA Tactical Allocation Portfolio, JNF Dynasty Liquid Alternatives Portfolio, and JNF SSgA Retirement Income Portfolio, each of which is an underlying fund offered in the variable annuities issued by its affiliate, Jefferson National Life, and distributed by its affiliates, Jefferson National Securities Corporation. Jefferson National Life and JNL NY each establishes Separate Accounts, registered as unit investment trusts under the Investment Company Act of 1940, as amended, to hold the assets that underlie the annuities.

Additionally, as described above, JNF Advisors serves as sponsor of the AAM Program, but has engaged a third party to recommend the model portfolios and the underlying funds in the model portfolios.

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

JNF Advisors receives no client referrals.

## **Item 15 – Custody**

JNF Advisors does not custody any assets and has no clients that should receive quarterly statements.

## **Item 16 – Investment Discretion**

JNF Advisors has discretionary authority on the JNF SSgA Sector Rotation Portfolio, JNF SSgA Tactical Allocation Portfolio, JNF Dynasty Liquid Alternatives Portfolio, and JNF SSgA Retirement Income Portfolio and the AAM Program.

## **Item 17 – Voting Client Securities**

Clients may obtain a copy of JNF Advisors complete proxy voting policies and procedures upon request.

## **Item 18 – Financial Information**

JNF Advisors does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients.

A balance sheet is not required to be provided because JNF Advisors does not serve as a custodian for client funds or securities, and does not require prepayment of fees of more than \$1,200 per client, and six months or more in advance.

## **Item 19 - Business Continuity Plan**

JNF Advisors has a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications, services or key people.

The Business Continuity Plan covers natural disasters such as snow storms, hurricanes, tornados, and flooding. The Plan covers man-made disasters such as loss of electrical power, , fire, , nuclear emergency, , biological event, T-1 communications line outage, and Internet outage,. Electronic files are backed up virtually real-time and archived offsite.

## **Item 20 - Information Security Program**

JNF Advisors maintains an information security program to reduce the risk that your personal and confidential information may be breached. JNF Advisors is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us. Currently JNF Advisors has no retail customer information since it has no retail customer accounts.