

**Item 1      Cover Page**

## **Luken Investment Analytics, LLC**

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Part 2A Appendix 1 of Form ADV

WRAP Fee Program Brochure

Version Date: March 6, 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](mailto: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](http://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 on January 23, 2018 are described below. This list summarizes changes to policies, practices or conflicts of interests only.

- - No material changes.

## Item 3 Table of Contents

### Contents

Item 1	Cover Page .....	1
Item 2	Material Changes .....	2
Item 3	Table of Contents.....	3
Item 4	Services, Fees and Compensation .....	5
	Discretionary WRAP Fee Program .....	5
	Services .....	5
	Additional Fees.....	5
	Compensation .....	5
	Allocation Model Descriptions.....	6
Item 5	Account Requirements and Types of Clients .....	7
Item 6	Portfolio Manager Selection and Evaluation .....	7
	Standards Used to Calculate Portfolio Manager Performance.....	7
	Review of Performance Information .....	7
	Related Persons.....	7
	Performance-Based Fees and Side-By-Side Management .....	8
	Methods of Analysis and Investment Strategies / Material Risks Involved / Risks of Specific Securities Utilized .....	8
	Methods of Analysis.....	8
	Investment Strategies .....	8
	Material Risks Involved .....	8
	Voting Client Proxies .....	10
Item 7	Client Information Provided to Portfolio Managers.....	10
Item 8	Client Contact with Portfolio Managers .....	10
Item 9	Additional Information .....	11
	Disciplinary Information .....	11
	Other Financial Industry Activities and Affiliations .....	11

Conflicts of Interest.....	11
Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	12
Review of Accounts.....	12
Client Referrals and Other Compensation .....	12
Financial Information.....	12
Item 10 Requirements for State Registered Advisers .....	12

## **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 may include preparation of financial plans, explanation of investment concepts and strategies, asset allocation modeling, and assistance with interpreting investment performance reports. Services may also involve 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 may cancel the advisory services by giving 30 days written notice.

#### **Additional Fees**

For individual Clients who pay us advisory fees, in addition to our advisory fee, you may also incur certain charges imposed by third parties which are not assessed or received by LIA or your investment adviser representative. Such charges may 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, 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 may 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 may have 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 may 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 may result 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 broadbased 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 may have 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**

LIA does not use outside portfolio managers. 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 may be 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 may not 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 may not work long term.



Quantitative Model Risk: Investment strategies using quantitative models may 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 may 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 may fluctuate 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) may be 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 may 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. The account may 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**

LIA does not use outside 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**

LIA does not use outside 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**

In March 2001, the SEC determined that a firm for which Gregory Luken was a Fin. Op. had engaged in securities business from Oct. 4 - Oct. 12, 2000 when the firm's net capital was below the minimum required for those days. On Oct. 13, 2000, FINRA approved \$300,000 in capital that had been deposited months earlier in the reserve account as net capital. FINRA missed their guidelines for approving or denying the cash as net capital by more than 30 days. The minimum \$2,500 fine was imposed. No other action taken.

On April 16, 1999 and Nov. 10, 1999, two clients filed complaints to get reimbursed for a stock that lost value. Both clients had signed special high risk disclosures acknowledging the high risk of such securities. Both clients had multi-year history of high risk speculating and investing. Arbitration resulted in one client receiving \$55,056 and the other receiving \$51,825 which was paid by the supervising firm and Luken.

### **Other Financial Industry Activities and Affiliations**

Gregory L. Luken is President of Luken Investment Group, President and an investment adviser representative of Luken Investment Analytics 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 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.

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

Your adviser may give advice or exercise investment responsibility and take such other action with respect to other accounts and affiliated accounts which may differ 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.

### **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 may 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 does not have any solicitation arrangements where unaffiliated persons are compensated for soliciting client referrals.

### **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.