

**Form ADV Uniform Application for Investment Adviser Registration  
Investment Adviser Brochure**

**Form ADV Part 2A  
&  
Form ADV Part 2B**

**Luskin Financial Planning**

[JonLuskin.com](http://JonLuskin.com)

Jon Luskin, LLC  
5051 Chollas Parkway  
San Diego, CA 92105

**Dated October 21, 2021**

This “**Brochure**” provides information about the qualifications and business practices of Luskin Financial Planning (“**Adviser**”, “**we**”, “**us**”, “**our**” or the “**Firm**”).

If you have any questions about the contents of this Brochure, please contact our Chief Compliance Officer, Jon Luskin, at (619) 394-4644 or [compliance@jonluskin.com](mailto:compliance@jonluskin.com).

The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (“**SEC**”) or by any state securities authority. Additional information about our firm is also available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number, known as a CRD number. The firm’s CRD number is 314744.

Any reference to Luskin Financial Planning as a “registered investment adviser” or as being “registered” does not imply a certain level of skill or training.

## **ITEM 2: MATERIAL CHANGES**

Form ADV Part 2 requires registered investment advisers to amend their Brochure when there are material changes to their information or as necessary. If there are any material changes to an adviser's Brochure, the adviser is required to notify you and provide a description of the material changes.

**Given that this is an initial filing, material changes do not apply.**

You may view our current Brochure on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or CRD #314744. You may also request a copy of this Brochure at any time by contacting us by phone at (619) 394-4644 or [compliance@jonluskin.com](mailto:compliance@jonluskin.com).

### **ITEM 3: TABLE OF CONTENTS FORM ADV PART 2A**

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 .....	6
Item 6: Performance-Based Fees .....	8
Item 8: Methods of Analysis, Investment Strategies and Risk of Loss.....	8
Item 9: Disciplinary Information .....	10
Item 10: Other Financial Industry Activities and Affiliations .....	10
Item 11: Participation or Interest in Client Transactions, Code of Ethics, and Personal Trading .....	11
Item 12: Brokerage Practices .....	12
Item 13: Review of Accounts .....	13
Item 14: Client Referrals and Other Compensation.....	13
Item 15: Custody .....	14
Item 16: Investment Discretion .....	14
Item 17: Voting Client Securities.....	14
Item 18: Financial Information.....	14
Item 19: Requirements for a State Registered Adviser .....	14

## **ITEM 4: ADVISORY BUSINESS**

### **A. Firm Information**

LUSKIN FINANCIAL PLANNING registered as an investment adviser with the State of California in May 2021. We were founded in April 14, 2021. The Firm is an hourly fee-only investment adviser registered with the States of California with its principal place of business in San Diego, CA. The Firm was formed under Jon Luskin, LLC, a California limited liability company. Jon Luskin, LLC is fully owned and operated by Jonathan Michael Luskin (“**Principal**”).

The Investment Advisers Act of 1940 (“**The Act**”), Section 202(a)(11) defines “Investment adviser” as a person who, for compensation, engages in the business of advising others, either directly or through publications or writings, as to the value of securities or as to the advisability of investing in, purchasing, or selling securities, or who, for compensation and as part of a regular business, issues or promulgates analyses or reports concerning securities.

LUSKIN FINANCIAL PLANNING offers hourly, fee-only, as-needed investment advice under The Act. We provide advice to Clients who contact us directly and to Clients referred by other investment advisers, investment companies, financial planners, accountants, pension consultants, attorneys, and other professionals (“**other Advisers**”). We are not portfolio managers. We do not have discretion over Client portfolios or take custody of assets. A Client must implement on their own or through another adviser and using a custodian of their choosing. A Client may choose not to implement our recommendations.

LUSKIN FINANCIAL PLANNING generally limits investment recommendations to open-end mutual funds and exchange-traded funds (“**ETFs**”), primarily those that follow market indices. We will consider a Client’s preferred custodian and attempt to select mutual funds and/or ETFs that are available through their custodian at low cost and with low/no transaction fees. Some Clients have individual securities (stocks, bonds, etc.) they wish to retain. We may advise clients on those securities; however, we are not obligated to do so under the adviser agreement.

We serve as a fiduciary to Clients as defined under applicable laws and regulations. As a fiduciary, we uphold a duty of loyalty, fairness and good faith towards each Client and seek to mitigate potential conflicts of interest. Our fiduciary commitment is further described in our Code of Ethics. For more information regarding our Code of Ethics, see Item 11 – Participation or Interest in Client Transactions, Code of Ethics, and Personal Trading.

### **B. Advisory Services Offered**

LUSKIN FINANCIAL PLANNING offers direct fixed-fee and hourly fee-only investment advice to individual Clients and Clients of other Advisers.

#### **Hourly and Fixed-fee Investment Advice:**

- Custom advice designed to use efficient and effective strategies that lower fees and taxes;
- For individuals, high net worth individuals, retirement plan sponsors; and, trustees of foundations, endowments and other non-profit organizations (each, a “Client”), and;
- Other Advisers who engage the firm to advise their own Clients directly or indirectly.

LUSKIN FINANCIAL PLANNING provides fixed-fee financial reviews hourly as-needed advice and for all

Clients regardless of how they come to the firm. We provide the same service and charge the same fee as outlined in Item 5A for Clients who hire the Firm directly or indirectly through their other Adviser.

If a prospective client is interested in engaging the Firm, they will be provided a current Form ADV Part 2A combined brochure that includes Item 19 - Privacy Policy and Item 20 – Requirements for State Advisers. Before we provide advisory services, we first enter into a written agreement with each Client or the Client's other Adviser. Services are then customized for each Client.

LUSKIN FINANCIAL PLANNING believes in a passive investment philosophy and generally limit our recommendations to low-fee market-tracking products such as index funds and ETFs. We do not attempt to outperform the markets by timing, sector rotation, security selection or any other means.

In providing this advice, we begin by discussing each Client's background, goals, risk tolerance, and current holdings. This assists us in understanding a Client's needs before recommending changes to their current strategy. We may provide, but are not limited to, one-time portfolio reviews, written investment plans, recommendations for implementation, and referrals to qualified third parties.

LUSKIN FINANCIAL PLANNING does not take discretion over the management of Client portfolios. Implementation is the Client's responsibility or the responsibility of their other Adviser. We may recommend a third-party portfolio manager, financial planner, or other professional if a Client needs or desires one. We are not compensated in any manner for Client referrals and do not pay for Client referrals. See Item 14 for information on potential conflicts of interest concerning third party activities.

Our agreement is typically signed by the Client and that client pays our fee. When a Client is referred to us by their other Adviser, either the Client or their other Adviser signs our agreement and pays our fee. The latter decision is between the Client and their other Adviser.

LUSKIN FINANCIAL PLANNING services are provided in our capacity as a fiduciary under the Employee Retirement Income Security Act of 1974, as amended ("ERISA"). In accordance with ERISA Section 408(b)(2), Plan Sponsors are provided with a written description of LUSKIN FINANCIAL PLANNING's fiduciary status, the specific services to be rendered and all compensation, whether direct or indirect, that a Plan Sponsor should reasonably expect under the engagement.

### **C. Client Account Management**

LUSKIN FINANCIAL PLANNING provides advice only. All accounts are customized to a Client's need. This begins by gathering information from a Client about their background, goals, risk tolerance, and current holdings. This is done through a questionnaire or over the phone. The Firm then analyses the client's current investments and assesses whether the portfolio is properly aligned with the Clients short- and long-term needs.

The Firm then engages the client in a discussion before making recommendations that may lower investment cost, reduce redundancy, simplify a portfolio, and create an overall better fit for the Client. A Client may impose restrictions on investing in certain securities or types of securities due to tax considerations and other circumstances.

Portfolio implementation is the responsibility of each Client or their other Adviser. The firm does not assume discretion over Client assets, does not trade accounts, and does not custody assets. The Firm

does not provide investment supervisory services, also known as investment management, portfolio management or asset management.

An Investment Policy Statement (IPS) is not automatically provided as part of the advisory agreement. It may be requested of LUSKIN FINANCIAL PLANNING by a Client and our regular fee applies to the time allotted for an IPS preparation. The written IPS then belongs to the Client and can be used by them or their other Adviser in the implementation of an investment plan.

When a Client hires a third-party to manage their portfolio or for any other services, the Client is responsible for contracting with that firm and paying their fee. The cost is not included in the LUSKIN FINANCIAL PLANNING fee.

#### **D. Wrap Fee Programs**

LUSKIN FINANCIAL PLANNING does not participate in any wrap fee programs.

#### **E. Assets Under Management**

LUSKIN FINANCIAL PLANNING does not manage Client assets or assume discretion over Client assets.

### **ITEM 5: FEES AND COMPENSATION**

#### **A. Fees for Advisory Services**

First time clients are billed a fixed \$1,125 fee for a **Portfolio 2nd Opinion™** and returning clients are billed at \$450 per hour (\$45 per 6-minute intervals).

Our Portfolio 2nd Opinion™ introductory offer is available for new Clients in lieu of the hourly rate. The \$1,125 Portfolio 2nd Opinion™ fee covers a financial document review, up to 2.0 hour consultation, and summary letter. Clients requesting extra time during a Portfolio 2nd Opinion™ are invoiced at \$450 per hour in addition to the \$1,125.

LUSKIN FINANCIAL PLANNING fees are non-negotiable. The Firm may waive fees at the sole discretion of the Principal. LUSKIN FINANCIAL PLANNING may also change fees at the sole discretion of the Principal. Clients will be notified three (3) months in advance of any fee change. A fee change will be published on JonLuskin.com prior to taking affect but may not be updated in this document until the next annual amendment on March 31.

#### **B. Payment of Fees**

Invoices are sent electronically at the end of a consultation. Methods of payment include credit card, check, and bank draft. There is no extra charge to a client for bank drafts or credit card payment. Checks should be made payable to Jon Luskin, LLC. Once an invoice is paid, no refund will be made.

All fees are due within 30 days of their invoice date. LUSKIN FINANCIAL PLANNING has the right to charge interest of 1.5% per month on unpaid balances until the account is paid in full.

Either party may cancel the advisory agreement for any reason by notifying the other party in writing. Any fees incurred prior to termination become fully payable within 30 days of the termination date.

### **C. Other Fees and Expenses**

Clients are responsible for the payment of fees and charges imposed by third parties in connection with the services of others. These include, but are not limited to fees from other Advisers, custodians, mutual funds and ETFs. LUSKIN FINANCIAL PLANNING receives no part of the fees charged by others.

### **D. Prepayment of Fees**

LUSKIN FINANCIAL PLANNING does not invoice in advance and does not require a deposit. Instead, invoices are submitted to clients following services rendered. Invoices are sent simultaneously to the financial plan deliverable, once the consultation is over. Invoices are sent in arrears.

In the event a Client voluntarily pays a deposit, upon termination of our service, the unused portion of the deposit will be refunded based on the prorated amount of work completed using the hourly rate.

### **E. Termination of Services**

LUSKIN FINANCIAL PLANNING offers one-time and hourly as-needed advice-only, fee-only financial planning. There is no ongoing commitment. There is no quarterly, monthly or ongoing billing of any type.

Either party may terminate the agreement at any time by providing written notice to the other. LUSKIN FINANCIAL PLANNING will not be responsible for further services upon receipt of a verbal or written termination notice. We will also not be responsible for closing Client accounts with another Adviser or third party. Should a Client wish to do so, the Client must communicate with those third parties directly.

Clients requesting a termination after a payment has been made for services rendered will not be eligible for a refund.

### **F. Compensation for Sales of Securities**

LUSKIN FINANCIAL PLANNING does not buy or sell securities and does not receive any compensation for securities transactions.

### **G. Compensation for Sales of Any Financial Product**

As a fee-only Registered Investment Advisor (RIA), LUSKIN FINANCIAL PLANNING hold no sales licenses.

As a fee-only financial planner, LUSKIN FINANCIAL PLANNING, or an affiliate or associated person of the investment adviser, will *not* receive commissions from the sale of insurance or real estate or will receive fees or other compensation from the sale of securities or other products or services recommended in the financial plan.

The client is under no obligation to act on the investment adviser's or associated person's recommendation.

Even if the client elects to act on any of the recommendations, the client cannot effect the transaction through the investment adviser or the associated person as LUSKIN FINANCIAL PLANNING is fee-only.

## **H. FULL DISCLOSURE OF CONFLICTS OF INTEREST**

*Without* sales licenses to sell securities or discretion to investment on a clients behalf, LUSKIN FINANCIAL PLANNING has fewer conflicts of interest when working with clients. When there are any material conflicts of interest when working with clients, those conflict of interest are disclosed directly to the client.

## **ITEM 6: PERFORMANCE-BASED FEES**

LUSKIN FINANCIAL PLANNING does not charge performance-based fees.

## **ITEM 7: TYPES OF CLIENTS**

LUSKIN FINANCIAL PLANNING offers advisory services directly and indirectly to individuals, families, family offices, retirement plans, non-profit organizations, and most other legal entities. We do not offer exclusive contracts. Hiring our Firm does not preclude any other potential Client from hiring our Firm. All Client information is held in strict confidence. Refer to Item 19 – Privacy Policy.

LUSKIN FINANCIAL PLANNING offers one-time and hourly as-needed advice-only, fee-only financial planning. As such, LUSKIN FINANCIAL PLANNING does not oversee, have access to, open, close, or maintain client accounts. Therefore, account minimums do not apply.

## **ITEM 8: METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS**

### **A. Methods of Analysis**

When we are engaged to provide investment advice, we will first gather and consider several factors, including, but not limited to a Client's:

- current financial situation and need
- interim and long-term goals and objectives
- level of investment knowledge
- tolerance or appetite for risk, as well as the need to take risk
- tax basis of current holdings and an assessment of tax implications
- reasonable investment restrictions involving securities in a current portfolio

We then derive market research and product information from numerous sources, including but not limited to:

- Federal Reserve data
- IRS tax documents
- third-party research materials
- SEC filings

- fund sponsors
- media sources

All the above information comes together at LUSKIN FINANCIAL PLANNING to create a reasonable asset allocation and investment selection for a Client's short- and long-term needs. This analysis is discussed directly with each Client and final recommendations are made.

LUSKIN FINANCIAL PLANNING does not guarantee that investments will increase in value, and on the contrary, emphasizes that investing comes with inherent risk. Investments can and will lose value in certain years, and the Clients can and should expect their portfolio will lose value in certain years.

Investment advisers must also explain the material risks involved for each significant investment strategy or method of analysis they use and for any particular type of security they recommend primarily. Investment advisers must explain those risks in greater detail if the risks are unusual or significant. If the primary strategy involves frequent trading of securities, investment advisers must explain specifically how frequent trading can affect investment performance.

## **B. Investment Strategies**

LUSKIN FINANCIAL PLANNING generally employs a long-term, passive investment philosophy utilizing a strategic asset allocation for our Clients that is consistent with their long-term financial goals. Strategic asset allocation is defined as a fixed allocation among risky assets (stocks), less risky assets (fixed income), and cash that is rebalanced occasionally. The Firm does not invest in commodities, future, options or currencies, and does not attempt to time markets, rotate sectors or industries.

The Firm primarily utilizes low-cost market-tracking index mutual funds and ETFs to develop an asset allocation for each Client. The firm may recommend mutual fund and ETFs that have risk factors other than market risk, such as value and size risk. The overall allocation is designed to create an asset mix that will balance expected risk and return for a long-term investment horizon of typically 15 years or more.

## **C. Risk of Loss**

LUSKIN FINANCIAL PLANNING will assist Clients in determining an appropriate portfolio strategy based on their tolerance for risk and other factors. However, there is no guarantee that a Client will meet their goals. Investing in securities, including index funds or ETFs, involves investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss.

### ***Passive Investing***

A portfolio that employs a passive, efficient market approach (representative of "index investing") will not take defensive measures such as moving out of investments. In addition, the goal of passive or index investing is to deliver as close as possible to benchmark returns.

### ***Index Investing***

Strategies involving index investing have the potential to be affected by "active risk" (aka "tracking error risk"); or a deviation from a benchmark. Since the core portfolio attempts to closely replicate a stated benchmark, the source of the tracking error or deviation may come from a satellite portfolio or position,

or from a “sample” or “optimized” index fund or ETF that may not as closely align the benchmark. LUSKIN FINANCIAL PLANNING generally recommends large index funds that have had minimal tracking error.

### ***ETF and Mutual Fund Risks***

The risk of owning ETFs and mutual funds reflect the risk of their underlying securities (e.g., stocks, bonds, etc.). ETFs and mutual funds also carry additional expenses based on their share of operating expenses and certain brokerage fees. LUSKIN FINANCIAL PLANNING generally recommends broad funds that are among the lowest costs (minimizing expenses and maximizing diversification). We do not recommend leveraged or inverse ETFs, which involve greater risk.

### ***Fixed Income Risks***

Various forms of fixed income instruments, such as bonds, money market funds, bond funds, and certificates of deposit, may be affected by various forms of risk, including credit risk, duration risk, interest rate risk, liquidity risk, and reinvestment risk.

### ***Failure to Implement***

Implementation is the most important part of the investment process. Clients who choose not to take the steps recommended may face an increased risk that their stated goals and objectives will not be achieved. LUSKIN FINANCIAL PLANNING can assist a Client with implementation as part of the hourly service as well as provide introductions to independent advisers who can help implement.

**Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with LUSKIN FINANCIAL PLANNING and their other adviser if applicable.**

## **ITEM 9: DISCIPLINARY INFORMATION**

We have not been the subject of any disciplinary action, whether criminal, civil or administrative (including regulatory) in any jurisdiction. In addition, no persons involved in the management of the Firm have been the subject of any such action.

## **ITEM 10: OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS**

Jonathan Luskin, the sole owner of Jon Luskin, LLC, is a CERTIFIED FINANCIAL PLANNER™ (CFP®) professional through the Certified Financial Planner Board of Standards, Inc. in Washington, DC. He received his certification in 2016 and has maintained his certification with the Certified Financial Planner Board of Standards.

Jonathan Luskin is a volunteer for The San Diego Financial Literacy Center (SDFLC) of DebtWave Credit Counseling, Inc., a 501(c)(3), non-profit organization headquartered in San Diego. He is not compensated in any manner for his time or contribution. The organization enhances the financial IQ of San Diego County residents, focusing on youth (K-12 & College), military (active, transitioning, and veteran), and low-to-moderate income persons. Pro-bono financial planning is provided to consumers at no cost.

Jonathan Luskin is a peer reviewer for the Journal of Financial Planning. This journal is published monthly as part of membership in the Financial Planning Association. He is not compensated in any manner for his time or contribution.

Jonathan Luskin is NOT registered as a broker-dealer, registered representative of a broker-dealer, future commissions merchant, commodity pool operator, or commodity trading advisor.

#### **D. Recommending other Investment Advisers for Clients**

LUSKIN FINANCIAL PLANNING may recommend or select other investment advisers for clients. Prior to selecting other third-party investment advisers, LUSKIN FINANCIAL PLANNING will ensure that recommend investment advisers are properly licensed, registered, and or notice filed. LUSKIN FINANCIAL PLANNING does *not* receive compensation directly or indirectly from those advisers.

### **ITEM 11: PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS, CODE OF ETHICS, AND PERSONAL TRADING**

#### **A. Code of Ethics & Personal Trading**

LUSKIN FINANCIAL PLANNING and Jon Luskin, LLC has adopted a **Code of Ethics**, which includes our Employee Investment Policy. This policy establishes procedures with respect to investment transactions in accounts in which our “Supervised Persons” have a beneficial interest. The Firm will provide a copy of its **Code of Ethics** to any Client or prospective Client that request it.

In addition, the Firm follows the CFP Board's *Code of Ethics and Standards of Conduct*, which reflects the commitment that all CFP® professionals make to high standards of competency and ethics. The CFP Board's *Code of Ethics and Standards of Conduct* is available for review to Clients upon request.

#### **B. Personal Trading with Material Interest**

LUSKIN FINANCIAL PLANNING allows a Supervised Person to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. This may create the potential for a conflict of interest; however, the risk is mitigated by the Firm’s adoption of the CFP Board's *Code of Ethics and Standards of Conduct* whereby at all times when providing Financial Advice to a Client, a CFP® professional must act as a fiduciary, and therefore, act in the best interests of the Client.

We do not act as principal in any transactions. LUSKIN FINANCIAL PLANNING does not act as the general partner of a fund or an investment company, does not have a material interest in any securities traded in Client accounts, or recommend any security in which the Firm or a “related person” (e.g., associate, an immediate family member, etc.) has a material financial interest, such as in the capacity as a board member, underwriter or advisor to an issuer of securities, etc.

#### **C. Personal Trading in Same Securities as Clients**

LUSKIN FINANCIAL PLANNING has adopted personal trading policies to mitigate potential conflicts of interest when a Supervised Person trades in the same securities recommended to our Clients. We believe that our largely passive investment approach limits conflicts that can occur with respect to personal trading. When we believe a transaction may create a conflict of interest, our policy is to disclose it to our Clients and mitigate it through policies and procedures.

The fiduciary duty to act in the best interest of its Clients can potentially be violated if personal trades

knowingly and willingly made ahead of Clients, or by trading based on material non-public information. This risk is mitigated by requiring regular reporting of personal securities trades by a Supervised Person for review by our Chief Compliance Officer (“CCO”). A Supervised Person must not engage in personal trading that violates the fiduciary duty owed to each Client.

#### **D. Personal Trading at Same Time as Client**

While LUSKIN FINANCIAL PLANNING allows a Supervised Person to purchase or sell the same securities that may be recommended to and purchased by Clients, we believe the largely passive investment approach limits conflicts of interest that can occur with respect to personal trading and at the same time we recommend certain investments to Clients. Supervised persons must not engage in personal trading that violates the Code and Standards or the fiduciary duty owed to each Client.

To reduce or eliminate certain conflicts of interest involving personal trading (i.e., trading ahead of client recommendation, etc.), firm policy may require that we periodically restrict or prohibit Supervised Person transactions. Any exceptions must be approved by the firm, and we will maintain personal securities transaction records as required.

### **ITEM 12: BROKERAGE PRACTICES**

As an Adviser and a fiduciary to our Clients, we require that the Client interests must always be placed first and foremost, and our trading policies and procedures prohibit unfair trading practices and seek to disclose and to avoid actual or potential conflicts of interest or to resolve such conflicts in the Clients’ favor. We have adopted the following policies and procedures to meet the Firm’s fiduciary responsibilities and to ensure that our trading practices are fair.

#### **A. Recommendation of Custodians and/or Broker-Dealers**

##### ***Broker-dealer/Custodian Referrals***

LUSKIN FINANCIAL PLANNING does not receive any compensation from any third party in connection with the recommendation for establishing an account. As a fee-only hourly Adviser that does not manage portfolios, it is the Client’s decision where to custody assets and to move their assets to that custodian. The Client or their other Adviser is then responsible for negotiating the commission rates and other fees to be paid to the broker-dealer/custodian.

A Client that asks for a broker-dealer/custodian recommendation will be provided with one. Some of the factors we consider when recommending a custodian include, but are not limited to:

- The ability to invest in a wide variety of index funds and ETFs;
- Transaction costs and other custodian fees;
- Technology ease of use by Client;
- Customer service provided by the custodian;
- Access to local offices for those clients who prefer this option;
- Custodians already in use for 401(k), 403(b), SIMPLE IRA, etc. accounts of Client’s current employer.

Clients who are subject to ERISA agree that LUSKIN FINANCIAL PLANNING has no authority over the

broker-dealer or custodial decisions. The amount paid for brokerage, custody and other services is determined by the Client exclusively.

### ***Soft Dollars***

Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with the broker-dealer/custodian in exchange for research and other services. LUSKIN FINANCIAL PLANNING does not participate in soft dollar programs offered by any broker-dealer/custodian.

### **B. Trade Aggregation and Allocation**

LUSKIN FINANCIAL PLANNING does not trade Client accounts. Trading is the sole responsibility of the Client or their other Adviser.

## **ITEM 13: REVIEW OF ACCOUNTS**

### **A. Frequency and Nature of Periodic Reviews**

LUSKIN FINANCIAL PLANNING offers as-needed hourly advice. Client portfolios are reviewed by Jonathan Luskin when requested by each Client. The Client or their other Adviser is responsible to provide LUSKIN FINANCIAL PLANNING with current information about account holdings to be reviewed. Portfolios may include but are not limited to, a review of a Client's financial goals, current investment policy, risk tolerance level, cost, diversification, tax efficiency, and other matters.

### **B. Factors Resulting in a Non-Periodic Account Review**

Client portfolios are reviewed by Jonathan Luskin as requested by each Client. Reviews often occur after material events (market, economic or political) or due to a significant change in a Client's financial situation (pre-retirement, change in employment situation, inheritance, change in family status).

### **C. Client Reporting**

LUSKIN FINANCIAL PLANNING does not manage investment portfolios or provide ongoing monitoring of client assets. We may communicate with current and former Clients approximately once per month by email for marketing purposes to remind them of our services. The email is not investment advice.

## **ITEM 14: CLIENT REFERRALS AND OTHER COMPENSATION**

We are compensated only through fees charged directly to Clients or their other Adviser. Neither LUSKIN FINANCIAL PLANNING nor other Jon Luskin, LLC business accepts compensation from any Client based on a percentage of their assets or brokerage commissions or any other form of payment.

If another Adviser refers Clients to LUSKIN FINANCIAL PLANNING, there should be no expectation on behalf of the other Adviser that we will refer Clients back to them. LUSKIN FINANCIAL PLANNING may send a referral to a third party that we have received a referral from only if we believe referring to that firm is in the best interest of the Client. No revenue or economic benefit of any kind is expected or anticipated by LUSKIN FINANCIAL PLANNING or any Jon Luskin, LLC business for a referral to an Adviser or third party.

Another Adviser or third party may hire Jon Luskin, LLC and become an Industry Consulting Client (Refer to Item 19B – Other Businesses). This firm should have no expectation they will receive referrals from LUSKIN FINANCIAL PLANNING because they are an Industry Consulting Client. If it is in the best interest of a Client to refer to an Industry Consulting Client, the relationship will be fully disclosed to the investment Client in writing at the time the referral is made. An example would be a referral to an asset manager who is an Industry Consulting Client of Jon Luskin, LLC.

### **ITEM 15: CUSTODY**

LUSKIN FINANCIAL PLANNING does not accept or maintain custody of any Client accounts. It is the Client's decision to custody assets with the Custodian and to move their assets to that custodian. The Client or their other Adviser is also responsible for negotiating the commission rates and other fees to be paid to the broker by the Client. LUSKIN FINANCIAL PLANNING is not responsible for paying any commissions or custodial charges. For more information about Custodians and brokerage practices, see Item 12 - Brokerage Practices.

### **ITEM 16: INVESTMENT DISCRETION**

LUSKIN FINANCIAL PLANNING does not accept discretion over Client assets.

### **ITEM 17: VOTING CLIENT SECURITIES**

LUSKIN FINANCIAL PLANNING does not manage investment portfolios and does not accept proxy-voting responsibility for Clients. We may assist in answering written questions from Clients relating to some proxy issues; however, the Client or their other Adviser retains the sole responsibility for proxy decisions and voting.

### **ITEM 18: FINANCIAL INFORMATION**

Neither LUSKIN FINANCIAL PLANNING nor Jon Luskin, LLC or Jonathan Luskin has been subject to a bankruptcy or financial compromise. We have no financial commitments that would reasonably impair our ability to meet our contractual obligations and fiduciary commitments to our Clients. We do not require or solicit prepayments from Clients of \$500 or more six months or more in advance and thus are not subject to SEC Rule 206(4)-4.

### **ITEM 19: REQUIREMENTS FOR A STATE REGISTERED ADVISER**

All relevant information is provided in ADV Part 2B.

#### **C. Performance-based Fees**

LUSKIN FINANCIAL PLANNING offers as-needed hourly advice and one-time financial planning. LUSKIN FINANCIAL PLANNING does *not* offer assets under management services. Without custody or discretion over client accounts, performance-based fees do not apply.

#### **D. No Events Where Found Liable**

No representative or staff of LUSKIN FINANCIAL PLANNING has been involved in any of the events listed below:

1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:

- (a) an investment or an investment-related business or activity;
- (b) fraud, false statement(s), or omissions;
- (c) theft, embezzlement, or other wrongful taking of property;
- (d) bribery, forgery, counterfeiting, or extortion; or
- (e) dishonest, unfair, or unethical practices.

2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:

- (a) an investment or an investment-related business or activity;
- (b) fraud, false statement(s), or omissions;
- (c) theft, embezzlement, or other wrongful taking of property;
- (d) bribery, forgery, counterfeiting, or extortion; or
- (e) dishonest, unfair, or unethical practices

#### **E. No Relationships with Issuers of Securities**

Neither LUSKIN FINANCIAL PLANNING nor any representative or staff of LUSKIN FINANCIAL PLANNING has any formal arrangement with any issuer of securities.

# Form ADV Uniform Application for Investment Adviser Registration

## Form ADV Part 2B Investment Adviser Brochure Supplement with Requirements for a State Registered Adviser

### LUSKIN FINANCIAL PLANNING

[www.JonLuskin.com](http://www.JonLuskin.com)

Supervised Person: Jonathan Michael Luskin

[hello@JonLuskin.com](mailto:hello@JonLuskin.com)

5051 Chollas Parkway  
San Diego, CA 92105  
(619) 394-4644

**October 21, 2021**

Form ADV Part 2B brochure supplement provides information about Mr. Luskin that supplements the *LUSKIN FINANCIAL PLANNING* brochure. You should have received a copy of that brochure. Please contact Mr. Luskin if you did not receive a copy or if you have any questions about the contents of the brochure or this supplement. Additional information about Jonathan Michael Luskin (Individual CRD# 6348626) is available on the Securities and Exchange Commission's (SEC) website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**TABLE OF CONTENTS FORM ADV PART 2B**

Item 2: Educational Background and Business Experience ..... 18

Item 3: Disciplinary Information ..... 18

Item 4: Other Businesses ..... 18

Item 5: Additional Compensation ..... 19

Item 6: Supervision ..... 19

## **ITEM 2: EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE**

### **Jonathan Michael Luskin**

*Founder, Member, CEO*

*Born: 1982*

#### **Education:**

- Personal Financial Planning certificate from University of California, Los Angeles Extension.
- Master of Business in Non-profit Management from American Jewish University.
- Bachelor of Sociology from California State University, Northridge.

#### **Business Experience:**

- Investment Adviser Representative for registered investment adviser Rick Ferri, dba Ferri Investment Solutions LLC 2021
- Investment Adviser Representative for registered investment adviser Define Financial, LLC 2016-2020 (with Define Financial under Advanced Practice Advisors, LLC in 2016)
- Investment Adviser Representative for Wealth Analytics Partners, LLC 2013-2015

The Certified Financial Planner (CFP®) designation is a professional certification mark for financial planners conferred by the Certified Financial Planner Board of Standards (CFP Board). CFP® professionals have met extensive training and experience requirements, and commit to CFP Board's ethical standards that require them to put their clients' interests first.

To receive authorization to use the designation, the candidate must meet education, examination, experience and ethics requirements. Annually, CFP® professionals confirm that they are adhering to CFP Board's Code of Ethics and Standards of Conduct to maintain CFP® certification. In addition, every two years, CFP® professionals are required to complete continuing education (CE).

## **ITEM 3: DISCIPLINARY INFORMATION**

Registered investment advisors are required to disclose certain material facts regarding any criminal, civil, legal or industry/professional association disciplinary event that would be material to your evaluation of each officer or a supervised person providing investment advice. No reportable information is applicable to this section for Jonathan Michael Luskin.

## **ITEM 4: OTHER BUSINESSES**

This section explains other business activities of Mr. Luskin, sole owner of Jon Luskin, LLC, that do not fall under the definition of "Investment adviser" under Section 202(a)(11) of the Advisers Act (see Item 4A of this document.)

### **Industry Consulting**

Mr. Luskin offers business consulting services at an hourly rate to many businesses and professionals through Jon Luskin, LLC. Clients may include, but are not limited to, financial planning firms, investment companies, and other professional businesses. Services include, but are not limited to, (ghost) writing, marketing, website design, workflow and customer relationship management software integration, and financial planning software development consultation.

Industry consulting does not take up a substantial amount of Mr. Luskin's time.

Advisory services for individual investing clients that are referred from industry clients fall under Section 202(a)(11) of the Advisers Act. This requires a separate engagement with LUSKIN FINANCIAL PLANNING as outlined in ADV Part 2A, Item 4(A), Advisory Business.

### **Speaking**

From time to time, Mr. Luskin also accepts honorariums or travel stipends for speaking engagements. Speaking does not take up a substantial amount of time or provide a substantial amount of Mr. Luskin's income.

## **ITEM 5: ADDITIONAL COMPENSATION**

Mr. Luskin is provided additional compensation for the services disclosed in Item 4. He is not compensated for advisory services involving performance-based fees and does not accept or receive additional economic benefit such as incentive trips, technology services, material goods, etc. Neither the Firm nor Mr. Luskin has a material relationship with an issuer of any security.

## **ITEM 6: SUPERVISION**

Mr. Luskin is the sole owner and employee of LUSKIN FINANCIAL PLANNING and is responsible for all aspects of the firm including complying with state and federal regulatory rules. The Firm recognizes that not having all organizational duties segregated may potentially create a conflict of interest. Accordingly, the Firm employs policies and procedures to ensure what is believed to be appropriate recordkeeping and supervision. Certain functions may be outsourced to assist in these efforts when deemed necessary.

Questions relative to our firm, services or this ADV may be made to Mr. Luskin at (619) 394-4644.

## **ITEM 7: REQUIREMENTS FOR STATE-REGISTERED ADVISERS**

The supervised person has *not* been involved in any of the events listed below:

1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:

- (a) an investment or an investment-related business or activity;
- (b) fraud, false statement(s), or omissions;
- (c) theft, embezzlement, or other wrongful taking of property;
- (d) bribery, forgery, counterfeiting, or extortion; or
- (e) dishonest, unfair, or unethical practices.

2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:

- (a) an investment or an investment-related business or activity;

- (b) fraud, false statement(s), or omissions;
  - (c) theft, embezzlement, or other wrongful taking of property;
  - (d) bribery, forgery, counterfeiting, or extortion; or
  - (e) dishonest, unfair, or unethical practices.
- B. The supervised person has **not** been the subject of a bankruptcy petition.