



ADV Part 3 Form CRS or Investor Bulletin

Date: March 9th, 2023

Relationship Summary: LUMA Capital is registered with the Securities and Exchange Commission as a registered investment advisory. We offer tailored managed portfolios and investment advice. We monitor and report on your portfolio on a regular basis. Our clients can grant us discretionary asset management on public market portfolios (stocks, bonds, cash) or to use us as a consultant. We have a simple, easy to understand management agreement between our firm and you. Brokerage, investment advisory services, fees, and reporting differ between advisory firms. Free and simple tools are available online at <http://www.investor.gov/CRS>. These tools will allow you to research other investment firms & provide educational materials about other firms.

Questions that you should ask before hiring an investment advisor

- *Given my financial situation, should I hire an investment advisor or not?
- *Can I manage my portfolio on my own without an investment advisor?
- *How will you choose investments to recommend to me? Will you manage my portfolio tailored to my specific goals and will you manage my portfolio different from other clients of your firm?
- *What is your experience, including any licenses, education, and other qualifications? What do these qualifications mean and how do they compare to others?
- *Further questions you should ask and items for discussion are below.

WHAT FEES WILL I PAY and WHAT ARE the IMPACT of FEES?

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. You should make sure to understand what costs and fees you are paying.

Clients pay a quarterly fee based upon the prior quarter's value. The fee can be as much as 1.5%. We agree on our fees based on a dialogue with our clients. Client's portfolios will also be subject to fees from their brokerage firms including commissions on the buying & selling of securities. They might also have fees on mutual funds or exchange traded funds. Minimizing fees will increase your long-term wealth. Further details on our fees can be found on our Form ADV, Part 2A brochure.

- **Questions you should ask an investment advisor include:**
- *Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees & costs, and how much will be invested for me?*
- *What is the long-term impact of fees?*
- *Can you please help me understand the other fees that I might pay on brokerage trading fees, on mutual funds which I might own or on exchange traded funds? Any other fees?*

What are your LEGAL Obligations to me when acting as my investment advisor?

How else does your firm make money and what conflicts of interest do you have?

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide. Here are some examples to help you understand what this means.

- We have an incentive to increase your portfolio under management by increasing your managed assets with our firm. If you bring additional assets of your overall portfolio under our management, our fees will increase. This could be a conflict with your long-term investment goals.
- We have other clients. We might have a conflict not only because of the time we spend with them but also by their potential strategies & portfolio's structure.
- Some clients have performance fees as part of their management contract.
- A full disclosure of these conflicts can be found on our ADV part 2 which we have provided. These conflicts are material in nature and need to be understood before you engage us.

Questions you should ask our firm:

- How might your conflicts of interest affect me and how will you address them?
- Does providing investment advice for other clients affect me? Will I be treated the same? How do I know that I will be treated the same?
- Since you manage money for other clients, how do I know that I will be able to spend time speaking and communicating to you about my portfolio and personal situation.

How do your financial professionals make money?

Our professionals are only paid salary. They do not earn any commissions on any investment advice or actions they take. They are not compensated or given any bonuses by increasing our assets under management.

Disciplinary History

As a financial professional, do you have any disciplinary history? For what type of conduct?

None of the principals of LUMA Capital has any history of disciplinary actions by any governmental regulatory authority. To research our firm and principals, please visit Investor.gov/CRS for a free and simple tool to research our firm and our financial professionals.

ADDITIONAL INFORMATION

Who will be my primary contact person? Is he or she a representative of an investment advisor or a broker dealer? Who can I talk to if I have concerns about how this person is treating me?

The primary contact person is Daniel Keller who is the CEO of LUMA Capital. LUMA is an investment advisor and not a broker dealer. Any complaints should be brought to his attention.

CONTACT INFORMATION: Our firm is reachable via telephone at (239) 659-2888 during normal business hours 9-5 Monday to Friday