

This brochure provides information about the qualification and business practices of WJ Interests, LLC.

If you have any questions about the contents of this brochure, please contact us at 281-634-9400 or by email at [wj@wjwealth.com](mailto:wj@wjwealth.com).

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.

Additional information about WJ Interests is available on the SEC website at [www.advisorinfo.sec.gov](http://www.advisorinfo.sec.gov).

The use of the terms "registered" and "registered investment advisor" refer only to registration with the SEC, and do not reflect a certain level of skill or training.

# NARRATIVE BROCHURE

Form ADV Part 2A

Updated March 29, 2019



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

[wj@wjwealth.com](mailto:wj@wjwealth.com)

281-634-9400

2333 Town Center Drive, Suite 100  
Sugar Land, TX 77478



# MATERIAL CHANGES

## Narrative Brochure - Form ADV Part 2A

### Annual update

This brochure, dated March 29, 2019, is the latest version of Form ADV Part 2A for WJ Interests, LLC, as required annually by the Securities and Exchange Commission (SEC).

### Material changes since last update on February 15, 2018:

1. Update discretionary assets under management to \$299 million.
2. Modified the Fees and Compensation Section to include a new fee schedule.
3. Removed the account minimum section.

### Full brochure available

This brochure is available:

1. Through WJ's website at [www.wjwealth.com](http://www.wjwealth.com) as a downloadable PDF.
2. By sending a request to [wj@wjwealth.com](mailto:wj@wjwealth.com).
3. By calling 281-634-9400 and requesting a copy.
4. By sending a request to WJ Interests, LLC, 2333 Town Center Drive, Suite 100, Sugar Land, TX 77478-4175.

# TABLE OF CONTENTS

Narrative Brochure - Form ADV Part 2A

<a href="#">Advisory Business</a> .....	5
Firm description	
Principal owners	
Types of advisor services	
Tailored relationships	
Wrap fee programs	
Assets we manage	
Agreements	
<a href="#">Fees and Compensation</a> .....	7
Initial fee for services	
Ongoing fee for services	
Additional fees to others	
<a href="#">Performance-Based Fees</a> .....	9
<a href="#">Types of Clients</a> .....	10
Description	
Account minimums	
<a href="#">Methods of Analysis, Investment Strategies and Risk of Loss</a> .....	11
Methods of analysis	
Investment strategies	
Risk of loss	
<a href="#">Disciplinary Information</a> .....	12
Legal and disciplinary	
<a href="#">Code of Ethics, Privacy Protection and Personal Trading</a> .....	13
Code of ethics	
We protect your information	
Personal conduct rule	
Personal trading policy	
Review of personal transactions	
Violations	

# TABLE OF CONTENTS

Narrative Brochure - Form ADV Part 2A

<a href="#">Other Activities and Affiliations</a> .....	14
Other financial industry activities and affiliations	
<a href="#">Brokerage Practices</a> .....	15
Selecting brokerage firms	
Best execution	
Soft dollars	
Order aggregation	
<a href="#">Review of Accounts</a> .....	19
Periodic reviews and review triggers	
Custodian reports	
WJ Interests reports	
<a href="#">Client Referrals and Other Compensation</a> .....	21
Client referrals	
Other compensation	
<a href="#">Custody</a> .....	22
Custody policy	
Qualified custodians	
Handling client funds	
Handling security certificates	
<a href="#">Investment Discretion</a> .....	24
Discretionary authority for trading	
Limited power of attorney	
<a href="#">Voting Client Securities</a> .....	25
Proxy votes	
Guidelines	
Conflicts of Interest	
Limitations	
Recordkeeping	
Class action lawsuits	

# TABLE OF CONTENTS

Narrative Brochure - Form ADV Part 2A

<a href="#">Financial Information</a> .....	29
Financial condition	
<a href="#">Employees</a> .....	30
CFP Designation	
Bill Jameson	
Jared Jameson	
Jonathan Chapman	
Brandon Arns	
Jordan Nightingale	
Farrah Gandhi	
Jennifer Jameson	
Alisha Weaver	
Amy McInnis	
Estella Bailey	
Appendix A: Privacy Policy .....	37
Appendix B: Business Continuity Plan Disclosure .....	38

# ADVISORY BUSINESS

## Narrative Brochure - Form ADV Part 2A

### Firm description

WJ Interests, LLC, (WJ) is a Texas limited liability corporation established in 1996 and is located in Sugar Land, Texas. The firm is a fiduciary and is registered with the United States Securities and Exchange Commission (SEC).

### Principal owners

The firm's principal owners are William O. (Bill) Jameson and Jared W. Jameson, each of whom owns 50 percent of the business.

### Types of advisor services

The actual services you receive will be identified in an advisory agreement and will be agreed upon by WJ and you. Services provided may include initial and ongoing financial planning and investment management, such as:

- Development of a current net worth statement.
- Development of a comprehensive cash flow incorporating current assets, liabilities, income, and expenses.
- A review of your estate plan, including wills, living wills and trusts, and powers of attorney.
- A review of any additional estate planning trusts or strategies, such as irrevocable life insurance trusts (ILITs), charitable remainder unitrusts (CRUTs), grantor retained annuity trusts (GRATs) or gifting programs.
- Development of saving plans for college or other major future expenses.
- A review of your insurance needs and current coverage, including life, disability, long-term care and casualty, such as home, auto or umbrella policies.
- An analysis of asset allocation and investment choices in your current portfolio, leading to the design of an optimal portfolio that meets your needs and risk tolerance.
- Development of a written Investment Policy Statement (IPS) that describes your optimal portfolio and investment implementation strategy.
- Continual monitoring and supervision of your investment strategy and portfolio, and rebalancing of your portfolio as necessary.
- Establishment of a WJ Client Investment Portal summarizing the consolidated performance for all your accounts managed by WJ Interests.

# ADVISORY BUSINESS

## Narrative Brochure - Form ADV Part 2A

- Regular updates of the financial planning items identified above as you request them, such as a review your goals and objectives, and updates of your financial planning checklist and cash flow.

### Tailored relationships

All of WJ's services are tailored to the specific needs of each of our clients. We attempt through multiple meetings and ongoing client interaction to provide investment advice that is relevant to each client's particular situation.

### Wrap fee programs

A wrap fee is charged for an investment program that bundles together services provided by different entities, such as brokerage, advisory, research and management. WJ Interests does not participate in such programs, and therefore, does not charge wrap fees.

### Assets we manage

As of December 31, 2018, WJ Interests managed the following amount of assets:

Discretionary	\$299 million
Non-Discretionary	\$0
Total Assets Managed	\$299 million

### Agreements

As a client of WJ Interests, you will be required to sign an advisory agreement that fully outlines the services you will be provided, the fees you can expect to pay, our responsibilities as your fiduciary and other articles that pertain specifically to your portfolio. This agreement also will be signed by WJ Interests and a copy will be posted to your WJ Client Investment Portal.

[Return to Table of Contents](#)



# FEES AND COMPENSATION

## Narrative Brochure - Form ADV Part 2A

### Wealth Management Fee

WJ Interests' wealth management fee is comprised of two components:

1. Fixed fee: The fixed fee is \$5,000 per year, plus
2. Asset-based fee: The asset-based fee is 0.5% per year. The asset-based fee is dependent upon the amount of assets we manage for you.

This is our standard fee which may be increased or decreased based on the complexity of the financial planning services requested, the characteristics of your portfolio, including the size and number of separate accounts, the types of investments to be purchased for the portfolio and the probability of substantial future additional investment contributions to your portfolio.

### Billing and types of payments

The wealth management fee is due at the beginning of each calendar quarter, specifically Jan 1, April 1, July 1 and September 1. Fees are based on the fair market value of your portfolio at the close of the last trading day of the previous quarter. Fees are deducted electronically from your portfolio. We do not accept cash or credit card payments.

An invoice will be posted to your WJ Client Investment Portal each quarter and will indicate whether your fees have been deducted from your account or are due from you. Fees will be assessed beginning with the initial transfer of your assets to the custodian.

Services that begin and end within a quarter, or are terminated before the end of the quarter, will be calculated by determining the number of whole months during which work was completed on your behalf, dividing that number by three, and prorating the quarterly fee based on this ratio. If you choose to end our agreement during the quarter, we will refund to you any unearned fees using the same ratio.

### Additional fees to others

In addition to the fees you pay us, you will also pay:

- Commissions, fees or transaction costs charged by the custodian who executes trade orders on your behalf;
- Fees charged by independent money managers who manage your assets;
- Internal fees or management expenses charged by mutual funds, variable annuities or 401(k) plans in which you may be invested;

# FEES AND COMPENSATION

Narrative Brochure - Form ADV Part 2A

- Custodian fees; and
- Retirement plan record-keeping, reporting or administrative fees.

WJ Interests does not receive any of these additional fees or charges.

[Return to Table of Contents](#)

---

# PERFORMANCE-BASED FEES

Narrative Brochure - Form ADV Part 2A

---

We will not, under any circumstances, charge performance-based fees.

[Return to Table of Contents](#)

---

# TYPES OF CLIENTS

Narrative Brochure - Form ADV Part 2A

---

## Description

We provide financial planning and investment management services to:

- Individuals and families (primarily).
- Pension and profit-sharing plans.
- Trusts, estates.
- Charitable Organizations.

[Return to Table of Contents](#)

# METHODS OF ANALYSIS

## Narrative Brochure - Form ADV Part 2A

### Methods of analysis, investment strategies and risk of loss

Our role in investment management is twofold. We develop asset allocations (mixes of various types of stocks, bonds and cash) and then identify money managers to choose individual stocks and bonds. In our first role, we rely on numerous sources to assist in making decisions, including:

- Research materials prepared by others.
- Information gathered through discussions with money managers and other financial experts.
- Annual reports, prospectuses and filings with the Securities and Exchange Commission (SEC).

Our second role is to identify exceptional money managers to select the individual stocks and bonds for the portfolio. Although we typically use mutual funds as our preferred investment vehicle, we occasionally include exchange traded funds and consider separately managed accounts as well. To select money managers, we use third-party research services, such as Morningstar; publicly available information provided by the fund, and extensive interviews and conference calls with the money managers themselves. Our typical money managers select stocks and bonds based on fundamentals, meaning they consider the business associated with the stock or bond and technical measures, meaning they consider past price movement. Most of our managers are long-term investors as well, meaning they view their ownership in a company as an investment in a business, not just in a stock.

WJ believes successful investors do not try to time the market by moving in and out of the market based on emotion; instead, they select good managers and stick with them. As a result, we are not rapid traders and we stay with managers for many years, even during periods of underperformance.

Despite all these efforts, your portfolio will decline in value during certain periods. We will work with you to develop your expectations regarding losses and can adjust your portfolio to reduce potential losses during market downturns.

Generally, we do not use more exotic methods, such as shorting, margin transactions, option writing or leveraged transactions, unless we have specifically agreed with you to implement these strategies. These types of strategies materially increase risk in portfolios; we avoid them unless you request them in writing.

Although most investments WJ recommends are publicly traded, for certain clients WJ recommends private, non-traded investments. For these investments, WJ requires prior approval by the client before purchase.

[Return to Table of Contents](#)

# DISCIPLINARY INFORMATION

Narrative Brochure - Form ADV Part 2A

## Legal and disciplinary

WJ Interests, its principals and staff members have no legal or disciplinary events in its history, including:

- No criminal or civil actions in any court.
- No administrative proceedings before the SEC, any other federal regulatory agency, any state regulatory agency, or any self-regulatory organization.

[Return to Table of Contents](#)

# CODE OF ETHICS

## Narrative Brochure - Form ADV Part 2A

WJ has a fiduciary duty to our clients, meaning we have a duty of utmost good faith to act solely in your best interest. We've developed the following policies and procedures to meet this standard:

### Code of Ethics

- The interests of clients will be placed ahead of WJ's or any employee's own investment interests.
- Employees are expected to conduct their personal securities transactions in accordance with our personal trading policy and will strive to avoid any actual or perceived conflict of interest with our clients.
- Employees will not take inappropriate advantage of their positions with WJ.
- Employees are expected to act in the best interests of each of our clients.
- Employees are expected to comply with federal securities laws.

### We protect your information

Employees are expected to exercise diligence and care in maintaining and protecting your nonpublic, confidential information. They are also expected to not divulge information regarding WJ's securities recommendations or client securities holdings to any individual outside of the firm, except:

- As necessary to complete transactions or account changes (for example, communications with brokers and custodians);
- As necessary to maintain or service a client or his/her account (for example, communications with a client's accountant);
- With service providers involved in administrative functions for WJ (such as our technology service provider), only after we have entered into a contractual agreement that prohibits the service provider from disclosing or using confidential information.
- As permitted by law.

### Privacy

Please see Appendix A for our Privacy Statement.

# CODE OF ETHICS

## Narrative Brochure - Form ADV Part 2A

### Personal conduct rule

WJ also has established a personal conduct rule to avoid any actual or perceived conflict with clients that addresses:

- Giving and receiving gifts.
- Serving as director for an outside company.
- Outside business interests.

In addition, new employees must acknowledge that they have read, understand and agree to comply with the Code of Ethics, personal trading policy and personal conduct rule. All employees are required to renew this acknowledgement each year as part of WJ's annual compliance practices.

### Personal trading policy

- Employees are required to know which securities are being traded by WJ, and are encouraged to consult with Jared Jameson, Chief Compliance Officer (CCO), to determine if a personal trade would be appropriate.
- Employees must receive approval from Jared Jameson before investing in an initial public offering (IPO) or an equity position within a non-public company. Jared will receive approval from Bill Jameson before approving the investment.
- Employees are required to report all their personal securities transactions and holdings each quarter. This includes the personal securities information of any family member living within the same household as the employee.
- Employees may hold or trade the following securities, which are considered safest for an employee to purchase, sell or hold from a regulatory perspective, both for WJ and the employee:
  - Shares of open-end mutual funds.
  - Shares of any money market fund.
  - Direct obligations of the US Government.
  - Money market instruments, such as bankers' acceptances, bank certificates of deposit, commercial paper, repurchase agreements and other high-quality, short-term debt.

### Review of personal transactions

Jared Jameson, CCO, will generally consider the following factors when reviewing reportable security holdings and transactions or approvals by employees to purchase IPOs or private placements:



# CODE OF ETHICS

## Narrative Brochure - Form ADV Part 2A

- Whether the investment opportunity should be directed to a client's account.
- Whether the amount or nature of the transaction affected the price or market for the security.
- Whether the purchases or sales being made for clients benefited the employee.
- Whether the transaction harmed any client.
- Whether the transaction has the appearance of impropriety.

### Violations

All employees are required to promptly report any violation of this policy to Jared Jameson, including the discovery of any violation committed by another employee. Examples of items that should be reported include noncompliance with federal securities laws, conduct that is harmful to clients and purchasing securities contrary to the personal trading policy.

Employees are encouraged to report any violations or apparent violations. Such reports will not be viewed negatively by firm management, even if the event is determined not to be a violation, but that it was reported in good faith.

### Sanctions

If an event is determined to be a violation of this policy, sanctions may be imposed, including loss of profits, reversal of the trade or suspension of trading privileges.

[Return to Table of Contents](#)

# OTHER ACTIVITIES AND AFFILIATIONS

Narrative Brochure - Form ADV Part 2A

## Other financial industry activities and affiliations

WJ Interests, its principals and staff members do not participate in any other financial industry activities outside of providing services to our clients. We also are not affiliated with any financial organization or association.

[Return to Table of Contents](#)

# BROKERAGE PRACTICES

## Narrative Brochure - Form ADV Part 2A

### Selecting brokerage firms

WJ is obligated, as a fiduciary, to make sure the broker we suggest you use provides a high level of service and the best execution for securities purchased through them.

When suggesting a broker, we consider the following:

- The financial condition of the brokerage.
- The quality of its record keeping.
- Its ability to obtain the best price.
- Its knowledge of the market, securities and industries.
- Its commission structure.
- Its technological sophistication.
- Its responsiveness to client concerns.
- Its reputation and integrity.

The determining factor is not always the lowest commission cost, but whether the transaction represents the best execution for the account.

WJ conducts a formal review of all our brokers at least once a year.

WJ does not accept client-directed brokerage arrangements.

### Soft dollars

WJ periodically uses research information provided by the broker-dealers with whom we conduct business. However, we do not have any agreements to compensate broker-dealers for their research information. We also do not compensate broker-dealers for third-party research services, known as "soft dollar arrangements."

### Order aggregation

WJ might aggregate trades if it is beneficial to you and we have established trade allocation policies to ensure all of our clients are treated fairly. A trade aggregation and allocation policy would include:

# BROKERAGE PRACTICES

## Narrative Brochure - Form ADV Part 2A

- Determining how a particular security is to be allocated before placing the trade with the broker.
- Bunching single orders into blocks when possible to obtain the best execution at the best security price available.

We attempt to provide the same investment opportunities to all of our clients, but when investment opportunities have a limited allocation, we consider the following in making the allocation decision:

- Your goals and objectives.
- Your risk tolerance.
- Your financial situation, including your asset base, liquidity and the character of your non-investable assets.
- Any restrictions or limitations you have placed on your portfolio.

We make every attempt to consistently apply a trade aggregation and allocation policy; however, in cases where use of this policy results in unfair or inequitable treatment to some or all of our clients, we may deviate from this policy.

[Return to Table of Contents](#)

# REVIEW OF ACCOUNTS

## Narrative Brochure - Form ADV Part 2A

### Periodic reviews and review triggers

WJ uses a software tool to monitor client accounts. The software provides notices of client contributions, withdrawals, or significant changes in asset allocation. The notices trigger a full review of the portfolio. Software notices are generated on a weekly basis. Additional reviews are prompted by volatile market conditions, changes in your goals and objectives, or changes in our model portfolios.

WJ meets monthly to set investment policy for the coming month. The meetings, referred to as Tactical Asset Allocation (TAA) meetings, occur near the end of the month and are attended by all investment advisors. Historical portfolio performance, individual investment performance, past portfolio changes, stock and bond market changes, and the current macroeconomic environment are reviewed. Investment policy for the coming month is set by developing security level targets for each type of portfolio we manage.

Portfolios managed by WJ vary based on risk tolerance, tax status, asset location, portfolio size and other factors. Proposed changes to portfolios are conveyed to clients through WJNotes, our investment email, and our quarterly journal, the WJournal. Potential trades are generated by our software, reviewed by an investment advisor and submitted to custodians electronically for trading. The decision to trade is based on several factors, including deviations from target weighting, tax consequences, holding period, manager changes and the size of the trade.

We believe that frequent contact is critical to ensure financial plans and investment portfolios continue to meet client needs. Consequently, we make every effort to discuss your portfolio with you through phone conversations and meetings. We also ask you to contact us if your financial circumstances change.

### Custodian reports

Our primary custodian is Charles Schwab & Co. Schwab provide monthly reports to clients for each of their accounts. Other custodians, such as 401(k) custodians, provide at least quarterly reports, with some providing monthly reports. Schwab provides access to client accounts continuously through their website.

WJ provides updated consolidated performance and holding summaries through our password-protected online client investment portal.

# REVIEW OF ACCOUNTS

Narrative Brochure - Form ADV Part 2A

## WJ Interests reports

WJ maintains a password-protected client portal for all clients. Performance, asset allocation and holdings information is updated daily. Clients may request a printed or emailed quarterly statement if they prefer not to use the investment portal.

[Return to Table of Contents](#)

# CLIENT REFERRALS

## Narrative Brochure - Form ADV Part 2A

### Client referrals

WJ does not:

- Compensate anyone for referring new clients to us.
- Receive compensation from other professionals to whom we may refer for other financial services.

### Other compensation

WJ is not paid by anyone besides our clients. WJ does not receive sales awards, prizes or other compensation for recommending specific investments or offering certain advice.

WJ may receive support services and products from Charles Schwab, TD Ameritrade, or other investment providers for free or at a discounted price, in order to better service client accounts.

Support services include:

- Investment-related research.
- Pricing information and market data.
- Software and other technology to provide access to client account data.
- Compliance and practice management-related publications, seminars or consulting services.
- Discounted or free attendance at conferences, meetings and other events.
- Marketing support.
- Computer hardware, software or other products.

You do not pay more for these services as a result of this arrangement. WJ has negotiated fixed transaction fees for the benefit of all our clients. Also, a portion of our trading involves buying and selling no transaction fee mutual funds. Finally all funds WJ uses are no-load mutual funds.

WJ has made no commitment to any institution to invest a specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as a result of the above arrangement.

[Return to Table of Contents](#)

# CUSTODY

## Narrative Brochure - Form ADV Part 2A

### Custody policy

WJ only has custody of your assets to the extent that we are able to deduct advisory fees directly from your accounts. The following procedures are designed to help ensure we do not inadvertently obtain further custody of client assets:

- We will obtain prior written authorization from you before deducting fees directly from your account.
- We will not hold client securities in WJ's name or in bearer form.
- We will not require you to prepay more than \$500 in fees six months or more in advance.
- Proceeds from the redemption of client securities may not be directed to WJ.
- We cannot have signatory power over your checking or custodial account.
- An employee may not serve as trustee of your account, unless you are an immediate family member of that employee.
- All wire transfers from your custodial accounts to any non-client accounts must be accompanied by your written authorization. We will not establish standing wiring or transfer authority between your account and any other account that does not have the like registration.

### Qualified custodians

- All client assets will be held by a qualified custodian, which may include a broker-dealer, bank or foreign financial institution.
- We will not route original custodial statements to you on behalf of a custodian. All custodian account statements will be sent directly to you.
- We ensure that you receive custodial statements directly from the custodian by:
  - Confirming with each custodian that statements were sent.
  - Confirming with you during client meetings that you are receiving statements from the custodian.
- You are required to open your custodial accounts. WJ will assist you by preparing paperwork for a new account, but you must authorize any new custodial account.



# CUSTODY

## Narrative Brochure - Form ADV Part 2A

- You are encouraged to carefully review your custodial statements and to compare them to your WJ statements. Contact us directly if you have questions regarding any discrepancies.

### Handling client funds

WJ will handle or forward checks clearly made payable to a third party, such as your custodian.

We will not handle or forward any other client check or security certificate. All such documents will be returned to you within three business days, and will not be forwarded to any other party.

### Handling security certificates

WJ will not handle security certificates, but may assist you in completing transfer documents and sending paperwork to ensure security certificates are properly deposited. You must be present during the process and are responsible for handling the certificates. Employees should never physically handle any security certificates.

[Return to Table of Contents](#)

# INVESTMENT DISCRETION

## Narrative Brochure - Form ADV Part 2A

### Discretionary authority for trading

WJ Interests requires full discretion to manage your account, which is given upon signing our advisor agreement. This grants us authorization to invest and reinvest the assets in your portfolio, make investment changes and other decisions in accordance with your Investment Policy Statement (IPS) without your prior consultation or approval. Because you are able to place restrictions in your portfolio, WJ may elect to overweight non-restricted securities or groups to compensate.

### Common client restrictions include:

- Individual stocks you would prefer are held in your accounts for tax purposes or other reasons.
- Managers or asset classes you cannot hold in your accounts.

WJ Interests does not accept non-discretionary management accounts as it is difficult for us to effectively manage portfolios without full discretion, due to time lags, documentation and regulatory requirements.

### Limited power of attorney

You will be required to provide limited power of attorney for each of your accounts. This document gives WJ authority to:

- Place trades on your behalf.
- Disburse funds to you or someone you designate.
- Pay asset management fees, if you so choose.
- Vote proxies, if you so choose.

[Return to Table of Contents](#)

# VOTING CLIENT SECURITIES

## Narrative Brochure - Form ADV Part 2A

### Proxy votes

WJ will vote all proxies unless you specifically reserve your right, in writing, to vote your own proxies.

As WJ's chief compliance officer, Jared Jameson is responsible for ensuring that all proxies received by WJ are voted in a timely manner and in a manner consistent with your best interests. Associate wealth manager Brandon Arns will serve as the proxy voting coordinator, who is responsible for reviewing and voting proxies. In Brandon's absence, Jared will review and vote proxies.

WJ has prepared proxy voting guidelines for certain types of common proxy voting items. The guidelines are reviewed and updated as necessary to reflect new issues and any changes in policies. In general, WJ will vote in accordance with its guidelines; however, we reserve the right to depart from the guidelines and make voting decisions on a case-by-case basis.

### Guidelines

In general, WJ will vote to oppose the following issues:

- Issues regarding the issuer's board entrenchment and anti-takeover measures, such as:
  - Proposals to stagger board members' terms.
  - Proposals to limit the ability of shareholders to call special meetings.
  - Proposals to require super majority votes.
  - Proposals requesting excessive increases in authorized common or preferred shares when management provides no explanation for the use or need of these additional shares.
  - Proposals regarding "poison pill" provisions.
  - Permitting "green mail."
- Providing cumulative voting rights.
- Social issues, unless specific client guidelines state otherwise, such as restrictions on investing in certain countries.

In general, WJ will vote to approve the following issues:

- Election of directors recommended by management, except if there is a proxy fight.

# VOTING CLIENT SECURITIES

## Narrative Brochure - Form ADV Part 2A

- Election of auditors recommended by management, unless seeking to replace current auditors.
- Date and place of the annual meeting.
- Limitations on charitable contributions.
- Ratification of directors' actions on routine matters that have arisen since the last annual meeting.
- Limiting directors' liability.

In general, WJ will vote on the following issues on a case-by-case basis:

- To pay directors solely in stocks.
- To eliminate mandatory retirement policies for directors.
- To rotate the annual meeting location or date.
- On stock grants to management and directors.
- On allowing indemnification of directors and/or officers after reviewing the applicable laws and extent of protection requested.

### Conflicts of interest

Brandon Arns will review each proxy proposal for conflicts of interest as part of the review process. A conflict of interest may exist if:

- WJ serves as the investment adviser to the investment company soliciting the proxy.
- WJ has a business relationship with, or is actively soliciting business from, either the company soliciting the proxy or a third party that has a material interest in the outcome of a proxy vote.

If Brandon has knowledge of a personal conflict of interest, such as a familial relationship with company management, he will refer voting of the proxy to Jared Jameson.

If a proxy proposal raises a material conflict between WJ's and your interests, WJ will resolve such a conflict following the steps below:

1. Vote in accordance with the guidelines.

# VOTING CLIENT SECURITIES

## Narrative Brochure - Form ADV Part 2A

2. If there are no guidelines in place to address the specific conflict, WJ may cast the proxies in the same proportion as other shareholders who are not affiliated with WJ, to the extent that WJ has available information to permit that form of voting, known as "shadow" or "mirror" voting.
3. If shadow voting is not an available option, WJ will abstain from voting the securities.
4. If WJ determines that it is in your best interest to cast the proxy, WJ will forward the voting materials to you.

### Limitations

In certain circumstances, WJ will not vote your proxies:

- If you have specified in writing that you will maintain the authority to vote proxies or have delegated the right to vote proxies to a third party. WJ will not vote the securities and will direct the relevant custodian to send the proxy material directly to you. Any proxy materials received by WJ will be forwarded promptly.
- If your account with WJ has been terminated. WJ will not vote any proxies received after the termination. You may specify in writing that any proxies received should be sent to you or a third party for action.
- If WJ determines that the value of your economic interest or the portfolio holding is indeterminable or insignificant.
- If the securities are no longer held in your account.
- If the cost of voting the proxy would exceed any anticipated benefits.

### Recordkeeping

WJ keeps proxy voting records indefinitely. You can request copies of WJ's proxy voting policies and procedures and how your proxies were voted by writing to [wj@wjwealth.com](mailto:wj@wjwealth.com) or 2333 Town Center Drive, Suite 100, Sugar Land, TX 77478.

### Class action lawsuits

WJ, as a general policy, chooses not to participate in class action lawsuits on behalf of its clients. Rather, we leave such decisions with you. WJ will help you decide if you should pursue a particular class action lawsuit upon request, by developing a cost-benefit analysis for example, but the final choice of whether to participate is yours.

---

# VOTING CLIENT SECURITIES

Narrative Brochure - Form ADV Part 2A

---

If you decide to pursue a class action lawsuit and ask for our assistance, you may be charged additional fees for the work necessary to file the claim.

[Return to Table of Contents](#)

---

# FINANCIAL INFORMATION

Narrative Brochure - Form ADV Part 2A

---

## Financial condition

WJ requires investment management fees to be paid in advance but never more than three months in advance. Unearned fees will be returned as specified in your advisory agreement.

As discretionary managers of your assets, our financial condition is important to meeting our contractual obligations. Our financial condition is such that it will not impair our ability to serve you.

WJ has never been the subject of a bankruptcy petition.

[Return to Table of Contents](#)

# EMPLOYEES

## Narrative Brochure - Form ADV Part 2A

### CFP Designation

WJ Interests takes seriously its responsibility for your financial well-being. That's why Bill, Jared, Jordan, Jonathan and Brandon are Certified Financial Planner® certificate holders as designated by the Certified Financial Planner Board of Standards, Inc.

In order to earn and maintain Certified Financial Planner designation, professionals must:

- Complete a comprehensive course of study approved by CFP Board.
- Pass a two-day, 10-hour CFP certification exam that tests their ability to apply financial planning knowledge. The exam covers the financial planning process, tax planning, employee benefits and retirement planning, estate planning, investment management and insurance.
- Must work as financial planners for at least three years before using the CFP designation.
- Abide by a strict code of professional conduct, known as CFP Board's *Code of Ethics and Professional Responsibility*, which sets forth their ethical responsibilities to the public, clients and employers.
- Disclose any investigations or legal proceedings related to their professional or business conduct during the application process, and every two years during the renewal process.
- Must complete a minimum of 30 hours of continuing education every two years to stay current with developments in the financial planning profession.

### Bill Jameson, CFP®

Bill Jameson (DOB 12/06/1940) is the founder and Chairman of WJ. As the senior partner, Additional information about Bill is available on the SEC's website at [www.advisorinfo.sec.gov](http://www.advisorinfo.sec.gov).

#### Education

CFP Board of Standards	Certified Financial Planner #63647	1999
College for Financial Planning	CFP Program	1996
California State University	Major in Civil Engineering	1959-1962

#### Business Experience

Chairman	WJ Interests, LLC	1996 to present
Vice President	Rust Lichliter/Jameson	1994-1996
President/CEO	Lichliter/Jameson & Assoc.	1977-1994



# EMPLOYEES

## Narrative Brochure - Form ADV Part 2A

### Disciplinary Information

Bill has no legal or disciplinary events in his history, including:

- No criminal or civil actions in any court.
- No administrative proceedings before the SEC, any other federal regulatory agency, any state regulatory agency, or any self-regulatory organization.

### Other business activities

Bill does not provide any financial services outside of WJ Interests.

Bill does provide business consulting services to civil engineering firms. Activities include strategic planning assistance, cash flow management advice and personnel management advice. Bill spends about four hours a week in this capacity.

### Additional compensation

Bill does not receive any additional compensation in the form of sales awards, commissions, prizes or bonuses from any outside entities.

### Supervision

Bill's advisory activities are monitored by:

Jared Jameson, Chief Compliance Officer  
WJ Interests, LLC  
2333 Town Center Drive, Suite 100  
Sugar Land, TX 77478-4175  
281-634-9400

# EMPLOYEES

## Narrative Brochure - Form ADV Part 2A

Jared Jameson, CFP®

Jared Jameson (DOB 11/15/1969) is the chief investment officer and President of WJ. Additional information about Jared is available on the SEC's website at [www.advisorinfo.sec.gov](http://www.advisorinfo.sec.gov).

### Education

CFP Board of Standards	Certified Financial Planner #66489	2000
College for Financial Planning	CFP Education Program	2000-2001
University of Texas at Austin	MBA	1991-1993
Southern Methodist University	BS, Civil Engineering	1987-1991

### Business Experience

CIO/President	WJ Interests, LLC	1997 to present
Engineer	Rust Environment and Infrastructure	1995-1997
Engineer	CH2M Hill	1993-1995

### Disciplinary Information

Jared has no legal or disciplinary events in his history, including:

- No criminal or civil actions in any court.
- No administrative proceedings before the SEC, any other federal regulatory agency, any state regulatory agency, or any self-regulatory organization.

### Other business activities

Jared does not provide any financial services outside of WJ Interests.

### Additional compensation

Jared does not receive any additional compensation in the form of sales awards, commissions, prizes or bonuses from any outside entities.

### Supervision

Jared's advisory activities are monitored by:

Bill Jameson, Chairman  
WJ Interests, LLC  
2333 Town Center Drive, Suite 100  
Sugar Land, TX 77478-4175  
281-634-9400

# EMPLOYEES

## Narrative Brochure - Form ADV Part 2A

Jonathan Chapman, CFP®

Jonathan Chapman (DOB 12/08/1980) is a wealth advisor at WJ. Additional information about Jonathan is available on the SEC's website at [www.advisorinfo.sec.gov](http://www.advisorinfo.sec.gov).

### Education

CFP Board of Standards	Certified Financial Planner #188772	2014
University of Texas - Austin	MBA, Finance	2011
United States Naval Academy	BS, Ocean Engineering	2003

### Business Experience

Wealth Advisor	WJ Interests, LLC	2016 to present
Banker/Investment Specialist	J. P. Morgan Private Bank	2011-2016
Investment Analyst Intern	Teacher Retirement System of Texas	Summer 2010
Officer	United States Marine Corps	2004-2009

### Disciplinary Information

Jonathan has no legal or disciplinary events in his history, including:

- No criminal or civil actions in any court.
- No administrative proceedings before the SEC, any other federal regulatory agency, any state regulatory agency, or any self-regulatory organization.

### Other business activities

Jonathan does not provide any financial services outside of WJ Interests.

### Additional compensation

Jonathan does not receive any additional compensation in the form of sales awards, commissions, prizes or bonuses from any outside entities.

### Supervision

Jonathan's advisory activities are monitored by:

Jared Jameson, Chief Compliance Officer  
WJ Interests, LLC  
2333 Town Center Drive, Suite 100  
Sugar Land, TX 77478-4175  
281-634-9400

# EMPLOYEES

## Narrative Brochure - Form ADV Part 2A

Brandon Arns, CFP®, CAIA

Brandon Arns (DOB 06/19/1991) is an associate wealth advisor at WJ. Additional information about Brandon is available on the SEC's website at [www.advisorinfo.sec.gov](http://www.advisorinfo.sec.gov).

### Education

CFP Board of Standards	Certified Financial Planner #6289995	2016
University of Texas – San Antonio	BBA, Finance	2013

### Business Experience

Associate Wealth Advisor	WJ Interests, LLC	2014 to present
--------------------------	-------------------	-----------------

### Disciplinary Information

Brandon has no legal or disciplinary events in his history, including:

- No criminal or civil actions in any court.
- No administrative proceedings before the SEC, any other federal regulatory agency, any state regulatory agency, or any self-regulatory organization.

### Other business activities

Brandon does not provide any financial services outside of WJ Interests.

### Additional compensation

Brandon does not receive any additional compensation in the form of sales awards, commissions, prizes or bonuses from any outside entities.

### Supervision

Brandon's advisory activities are monitored by:

Jared Jameson, Chief Compliance Officer  
WJ Interests, LLC  
2333 Town Center Drive, Suite 100  
Sugar Land, TX 77478-4175  
281-634-9400

# EMPLOYEES

## Narrative Brochure - Form ADV Part 2A

Jordan Nightingale, CFP®

Jordan Nightingale (DOB 07/04/1986) is an wealth advisor at WJ. Additional information about Jordan is available on the SEC's website at [www.advisorinfo.sec.gov](http://www.advisorinfo.sec.gov).

### Education

CFP Board of Standards	Certified Financial Planner #164392	2012
Texas Tech University	MS, Personal Financial Planning	2009
Texas Tech University	BBA, Economics	2008

### Business Experience

Wealth Advisor	WJ Interests, LLC	2016 to present
Associate Wealth Advisor	HFG Wealth Management	2014-2016
Associate Planner	Keener Financial Planning	2013-2014
Wealth Planner	Petersen Hastings Investment Management	2010-2013

### Disciplinary Information

Jordan has no legal or disciplinary events in his history, including:

- No criminal or civil actions in any court.
- No administrative proceedings before the SEC, any other federal regulatory agency, any state regulatory agency, or any self-regulatory organization.

### Other business activities

Jordan does not provide any financial services outside of WJ Interests.

### Additional compensation

Jordan does not receive any additional compensation in the form of sales awards, commissions, prizes or bonuses from any outside entities.

### Supervision

Jordan's advisory activities are monitored by:

Jared Jameson, Chief Compliance Officer  
WJ Interests, LLC  
2333 Town Center Drive, Suite 100  
Sugar Land, TX 77478-4175  
281-634-9400

# EMPLOYEES

## Narrative Brochure - Form ADV Part 2A

### Farrah Gandhi

Farrah is the business development manager for WJ. She has worked for the firm since 2013.

### Jennifer Jameson

Jennifer is the firm's bookkeeper. She has worked for WJ since 2015.

### Alisha Weaver, CPA

Alisha is the head trader for WJ. She has worked for the firm since 2003.

### Amy McInnis

Amy is the office manager for WJ. She has worked for the firm since 2017.

### Estella Bailey

Estella is the operations manager for WJ. She has worked for the firm since 2018.

[Return to Table of Contents](#)

# PRIVACY STATEMENT

## Narrative Brochure - Form ADV Part 2A

As required by the Securities and Exchange Commission and the Federal Trade Commission, the privacy policy below explains our handling of the information that we have in our records that is personal and private to you. It reiterates our commitment to keeping that information private.

WJ Interests, LLC, an independent financial planning firm, is committed to safeguarding the confidential information of its clients. We hold all personal information provided to our firm in the strictest confidence. These records include all personal information that we collect from you in connection with any of the services provided by WJ Interests, LLC. We have never disclosed information to nonaffiliated third parties, except as permitted by law, and do not anticipate doing so in the future. If we were to anticipate such a change in firm policy, we would be prohibited under the law from doing so without advising you first. As you know, we use health and financial information that you provide to us to help you meet your personal financial goals while guarding against any real or perceived infringements of your rights of privacy. Our policy with respect to personal information about you is listed below:

- We limit employee and agent access to information only to those who have a business or professional reason for knowing, and only to nonaffiliated parties as permitted by law. (For example, federal regulations permit us to share a limited amount of information about you with a brokerage firm in order to execute securities transactions on your behalf, or so that our firm can discuss your financial situation with your accountant or lawyer.)
- We maintain a secure office and computer environment to ensure that your information is not placed at unreasonable risk.
- The categories of nonpublic personal information that we collect from a client depend upon the scope of the client engagement. It will include information about your personal finances, information about your health to the extent that it is needed for the planning process, information about transactions between you and third parties, and information from consumer reporting agencies.
- For unaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors, we also require strict confidentiality in our agreements with them and expect them to keep this information private. Federal and state regulators also may review firm records as permitted under the law.
- We do not provide your personally identifiable information to mailing list vendors or solicitors for any purpose.
- Personally identifiable information about you will be maintained during the time you are a client, and for the required time thereafter that such records are required to be maintained by federal and state securities laws, and Professional Responsibility. After this required period of record retention, all such information will be destroyed.

If you have any questions, please contact us at 281-634-9400 or [wj@wjwealth.com](mailto:wj@wjwealth.com).

# BUSINESS CONTINUITY PLAN DISCLOSURE

## Narrative Brochure - Form ADV Part 2A

WJ Interests, LLC has adopted a Business Continuity Plan (“BCP”) pursuant to the Investment Advisers Act and the rules and guidance of the US Securities and Exchange Commission (“SEC”). The purpose of the BCP is to describe the plans WJ will use in the event of a significant business disruption (“SBD”). The BCP addresses both internal SBDs (e.g. death of key personnel) and external SBDs (e.g. hurricanes).

In the event of an SBD, the primary goals are as follows:

- A. Safeguard employee lives and firm property
- B. Make a financial and operational assessment
- C. Promptly recover and resume operations
- D. Protect the firm’s books and records

Our BCP addresses: alternate office locations, maintaining access to your funds and securities, data backup and recovery, and alternative communication methods to employees, clients and vendors.

Please remember WJ does not take custody of your funds. In the event WJ is not operational and unable to respond to your requests, you may always contact your custodian directly using the following contact information.

Charles Schwab & Co., Inc.  
1-800-515-2157  
[www.schwablliance.com](http://www.schwablliance.com)

TD Ameritrade  
1-800-669-3900  
[www.ameritrade.com](http://www.ameritrade.com)

It is our objective to inform you of our situation after an SBD as soon as possible. Historically we’ve primarily used email to update you. If necessary and practicable, we will change our phone message and post notices on our website.