

# Investment Adviser Brochure

## Form ADV Part 2A

### Disclosure Statement

#### AJENIFUJA INVESTMENTS, LLC

July 1, 2015

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This brochure provides information about the qualifications and business practices of Ajenifuja Investments, LLC. If you have any questions about the contents of this brochure, please contact us at (202) 462-4300 or at [www.ajenifuja.com](http://www.ajenifuja.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 Ajenifuja Investments is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) (the CRD number for Ajenifuja Investments is 130089).

While Ajenifuja Investments may refer to itself as a "registered investment advisor" or "RIA" Clients should be aware that registration itself does not imply any level of skill or training.

July 2015

Dear Client,

We are pleased to provide you with our investment Adviser Brochure ("Brochure"), which is also known as Part 2A of our firm's SEC Form ADV. It contains important information about our business practices as well as a description of potential conflicts of interest relating to our advisory business which could affect your accounts with us. This Brochure applies to the investment activities of Ajenifuja Investments, LLC and its various subsidiaries. For purposes of this Brochure, we collectively refer to these entities as "Ajenifuja Investments."

We are providing you with this material in accordance with Rule 204-3 of the Investment Advisers Act of 1940, which requires a registered investment adviser to provide a written disclosure statement upon entering into an advisory relationship. Future updates to this Brochure may be obtained by written request to Ajenifuja Investments, LLC, Attn: Kevin Ajenifuja, 5226 Klinge Street NW, Washington, DC 20016.

This Brochure is intended for clients whose accounts are services by Ajenifuja Investments.

Thank you for choosing Ajenifuja Investments. If you have any questions about the information in this statement, please contact your Ajenifuja Investments client service representative.

Respectfully yours,

Kevin Ajenifuja  
Chief Executive Office  
Ajenifuja Investments

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## **MATERIAL CHANGES FROM PREVIOUS VERSION** (ADV Item 2)

As this is the first brochure (Form ADV Part 2A) prepared by Ajenifuja Investments, no material changes exist since there have been no previous versions.

## **A. ADVISORY BUSINESS** (ADV Item 4)

### INTRODUCTION

Ajenifuja Investments, LLC (hereafter "AjenifujaInvestments") is a fee-based adviser that offers one type of advisory services, Pooled-Portfolio Management Services.

AjenifujaInvestments is a newly formed investment advisory firm, but the experience, education, and background of its principals and investment adviser representatives (hereafter "IA Reps") can be found in the accompanying brochure supplement document.

AjenifujaInvestments' principal owner is Kevin Adebayo Ajenifuja (hereafter "Ajenifuja"). Ajenifuja owns 100 percent of AjenifujaInvestments.

### INITIAL CONSULTATION

AjenifujaInvestments will begin by providing the Client a free initial consultation. AjenifujaInvestments uses the initial consultation to:

- Introduce the Client to AjenifujaInvestments, its services, and staff,
- Gather information about the Client's investment objectives, financial conditions, and risk tolerance, which AjenifujaInvestments uses in forming its investment advice; and
- Reach an agreement on the terms of service and compensation arrangements

At the conclusion of the initial consultation, the Client will sign AjenifujaInvestments' Investment Advisory Agreement, which serves as the contract between the Client and AjenifujaInvestments, specifying the precise nature of services to be rendered by AjenifujaInvestments and fees to be paid by the Client.

### POOLED-PORTFOLIO MANAGEMENT SERVICES

If the Client elects Portfolio Management Services, AjenifujaInvestments primarily seeks to manage Client accounts on a pooled-portfolio basis only.

AjenifujaInvestments will make ongoing recommendations primarily involving: Aggressive Stock Fund, Triple-Q Fund, and Guaranteed Fund. Given that the market will affect the value of these securities, AjenifujaInvestments will monitor Clients accounts on a daily basis so that it may make any necessary transactions.

The securities mentioned above reflect a broad range of investment risk, including some securities that entail high degrees of risk, such as stock options.

## **B. FEES AND COMPENSATION**

AjenifujaInvestments does not charge advisory fee or management fee based on a percentage of Client's assets under management.

## **C. PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT**

### MANAGEMENT FEE FOR POOLED-PORTFOLIO MANAGEMENT SERVICES

AjenifujaInvestments charges performance-based fees (fees based on gains), based on a percentage of return on invested assets. The fee percentage charged per year (annum) is listed in the following table by return on invested assets.

Return on Invested Assets	Fee %
Under 10%	5
10 to 19.99%	10
20 to 29.99%	20
23% and above	30

AjenifujaInvestments does not negotiate its management fee, but does offer discounts to select friends, employees and family.

AjenifujaInvestments charges the above management fee at the end of each calendar quarter. As the management fees are charged in arrears, AjenifujaInvestments does not offer refunds as services have already been performed. For the first quarter a Client engages AjenifujaInvestments or if a Clients terminates the service during the quarter, the fee will be prorated for only those days that Ajenifuja Investments rendered its services.

## **D. TYPES OF CLIENTS**

1. Individual: The majority of AjenifujaInvestments' Clients will be individuals seeking portfolio management services for their personal accounts. Portfolio Management Services will be restricted to individual accounts (or multiple

accounts in one household) with a minimum value of \$20,000. Notes: AjenifujaInvestments may waive the minimum for select friends and family.

2. Small Businesses: Occasionally, AjenifujaInvestments will provide advisory services to small businesses seeking portfolio management services for their organization's interests. Portfolio Management Services will be restricted to small businesses with a minimum assets value of \$50,000. Note: AjenifujaInvestments may waive the minimum for select non-profits at AjenifujaInvestments' discretion.

## **E. METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS**

AjenifujaInvestments uses fundamental and technical analysis to determine the investments in a given portfolio.

In its fundamental analysis, AjenifujaInvestments seeks to determine the intrinsic value of equities based on a thorough analysis of the fundamental business factors of the given stock(s) at issue. This includes: analysis of financial statements, earnings, dividends, management structure, competitive advantages, product offerings, competitors and markets. In essence, this method of analysis evaluates the overall condition of the company to determine whether it is a sound investment. Despite the fundamental analysis performed by AjenifujaInvestments, any investments in securities carries market risk and investors may lose their principal investment.

In its technical analysis, AjenifujaInvestments seeks to determine the future direction of prices through the study of past market data, primarily price and volume. This is done by charting the movement of investments to identify trends and patterns used in the selection of securities to purchase and price points to buy and sell. AjenifujaInvestments uses a number of stock screeners and other software to chart and analyze the movement of various investments. Despite the technical analysis performed by AjenifujaInvestments, any investment in securities carries market risk and investors may lose their principal investment.

The investment strategies used vary depending on the Client's financial goals and risk tolerance. Generally, Client seeking capital preservation with limited risk will be pooled into the Guaranteed Fund whereas Clients seeking growth with greater risk will be pooled into the Aggressive Stock Fund.

While AjenifujaInvestments will not engage in day-trading, active strategies may entail additional risk due to a greater frequency in transactions, which may involve additional transaction costs, and taxes. Also, strategies that use options may entail additional risk as losses may exceed those seen in the underlying stock.

## **F. DISCIPLINARY INFORMATION**

All aspects of AjenifujaInvestments' business are subject to various federal and state laws and regulations. Accordingly, from time to time, regulators contact AjenifujaInvestments seeking information concerning the firm and its business activities.

Currently, there are no material regulatory enforcement proceedings pending against AjenifujaInvestments or any of the other registrants covered by this brochure. A summary of past material regulatory proceedings involving AjenifujaInvestments and related party, all of which have been resolved, is set forth here:

In 2010, AjenifujaInvestments and related party were instructed by the DC Department of Insurance, Securities and Banking to stop doing business in the District of Columbia until they are licensed to do so.

## **G. OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS**

AjenifujaInvestments and its IA Reps do not engage sell or recommend other financial products other than provide portfolio management services.

## **H. CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING**

### **CODE OF ETHICS**

Pursuant to SEC Rule 204A-1, AjenifujaInvestments has a Code of Ethics that promotes the fiduciary duty of AjenifujaInvestments and its IA Reps. The Code of Ethics articulates the importance of trust as a foundation to the relationship between an investment adviser and its Clients and establishes policies and procedures to ensure that AjenifujaInvestments and its IA Reps place the interests of the Clients first. The Code of Ethics requires that AjenifujaInvestments and its IA Reps adhere to all applicable securities and related laws and regulations. The Code of Ethics also required AjenifujaInvestments and its IA Reps follow industry "best practices" involving confidential information, suitability of investments, personal trading on the part of AjenifujaInvestments and its IA Reps, outside business activities of IA Reps, and the disclosure of conflicts of interest.

A copy of the Adviser's Code of Ethics is available upon request for any Client or prospective Client.

### **PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING**

IA Reps of AjenifujaInvestments may have an interest in Client transactions insofar as they may personally invest in the same securities recommended to Advisory Clients. These transactions involve a conflict of interest as AjenifujaInvestments or IA Reps may benefit from an increase in price from subsequent purchases by Advisory Clients. To address this conflict of interest, AjenifujaInvestments and its IA Reps will adhere to the following procedures regarding their personal trading:

1. Client transactions will always be placed ahead of those for AjenifujaInvestments, its management, and its IA Reps;
2. AjenifujaInvestments and its IA Reps will mostly recommend investments that are widely traded;
3. In the rare instance where private placement offerings are recommended to Clients and an IA Rep also has an ownership interest in the private offering, full disclosure will be given so the Client fully understands that conflict of interest; and
4. Neither Advisory Clients nor IA Reps will have enough funds invested in any given security to move the market in that particular security.

## **I. BROKERAGE PRACTICES**

We rely upon brokers, dealers and other trading intermediaries to execute our client securities transactions. Clients do not pay separately for the transaction charges associated with the execution of trades in our pooled-portfolios. The brokers, dealers and other vendors that we utilize for trade execution are selected by AjenifujaInvestments' personnel.

## **J. REVIEW OF ACCOUNTS**

AjenifujaInvestments reviews all Fund holdings daily, but review individual Client accounts on a quarterly basis in conjunction with calculating their management fees. Pooled-Portfolio Management Clients are encouraged to meet with AjenifujaInvestments at least once per year to review their account as a whole, ensuring that the management aligns with their current financial condition, goal and objectives.

## **K. CLIENT REFERRALS AND OTHER COMPENSATION**

Persons introducing new client accounts to AjenifujaInvestments may receive a portion of the management fee generated by the account for a period which varies



on a case-by-case basis. Such compensation amounts to a portion of the management fee that we earn from the pooled vehicle, in compliance with legal requirements. These fees are not paid by clients.

## **L. CUSTODY**

AjenifujaInvestments will have physical custody of Clients' assets, monies, or securities at its broker-dealers and/or banks. Our Clients receive statements concerning their portfolios from at the end of every calendar quarter.

## **M. INVESTMENT DISCRETION**

As described in the "ADVISORY BUSINESS" section (pages 3-5 of this FIRM BROCHURE), AjenifujaInvestments will have investment discretion for Portfolio Management Services Clients.

## **N. VOTING CLIENT SECURITIES**

As a registered investment adviser that exercises proxy voting authority over client securities, we have a fiduciary duty to vote proxies in a timely manner and make voting decisions that are in our clients' best interests.

## **O. FINANCIAL INFORMATION**

AjenifujaInvestments would be required to disclose additional financial information if it were to charge fees in advance, but as described in the "ADVISORY BUSINESS" section (page 3-5 of this FIRM BROCHURE), AjenifujaInvestments charges all management fees in arrears. In any case, AjenifujaInvestments, its management and IA Reps have no material financial information in their backgrounds.

## **P. REQUIREMENT FOR STATE-REGISTERED ADVISERS**

AjenifujaInvestments has only one principal executive officer (or management person): Kevin A. Ajenifuja. His biographical information is given on the attached BROCHURE SUPPLEMENT document.

AjenifujaInvestments would be required to disclose additional information if it: were to have any other relationship or arrangement with any issuer of securities; or was ever found liable in either: (a) an arbitration, or (b) a civil, self-regulatory organization, or administrative proceeding. As none of these apply to AjenifujaInvestments, its management persons, or IA Reps (other than the

information disclosed under Disciplinary Information. AjenifujaInvestments has no additional information to disclose in these regards.

## **ATTACHMENT**

### A. Kevin A. Ajenifuja

Kevin Ajenifuja has over twenty years of experience as Chief Financial Officer of high performance finance organization for both multinational and startup companies with annual revenue ranges from \$10 million to \$500 million. He is highly skilled at combining strategic/tactical financial expertise with strong qualifications in business development, operations and P&L management. He has excellent record of reversing financial declines and capturing significant cost reductions through process re-engineering and performance enhancement.

He has a Master of Business Administration degree in finance and Bachelor of Science degree in Economics