

# AMJ Financial Wealth Management LLC

## Wrap Fee Program Brochure

*This brochure provides information about the qualifications and business practices of AMJ Financial Wealth Management LLC. If you have any questions about the contents of this brochure, please contact us at (703) 466-0477 or by email at: [abender@amjfinancial.com](mailto:abender@amjfinancial.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 AMJ Financial Wealth Management LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). AMJ Financial Wealth Management LLC's CRD number is: 162878*

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*Registration does not imply a certain level of skill or training.*

Version Date: 7/31/2018

## Item 2: Material Changes

This section addresses material changes since the date of our last annual amendment, which was dated March 9, 2018.

The material changes are as follows:

AMJ moved from Registration with various states to Registration with the U.S. Securities and Exchange Commission ("SEC").

If you would like another copy of this Brochure, please download it from the SEC website as indicate above or you may contact Angela Bender at (703) 466-0477 or [abender@amjfinancial.com](mailto:abender@amjfinancial.com).

We encourage you to read this document in its entirety.

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## Item 4: Services Fees and Compensation

AMJ Financial Wealth Management LLC (hereinafter "AMJ") offers the following services to advisory clients:

### A. Description of Services

AMJ participates in and sponsors a wrap fee program for certain investment management service clients. This wrap fee program allows AMJ to manage client accounts for a single fee that includes portfolio management services and custodial costs. The fees are payable monthly in advance and the final schedule for this program is represented below:

#### Strategic Asset Management Strategy – ETF and Mutual Fund Based

Total Assets Under Management	Total Annual Fee
Under \$250,000	1.50%
\$250,000 - \$499,999	1.45%
\$500,000 - \$749,999	1.25%
\$750,000 - \$999,999	1.15%
\$1,000,000 - \$1,999,999	1.00%
\$2,000,000 - \$4,999,999	0.90%
\$5,000,000 and Above	Negotiable

#### Dynamic Asset Allocation Accounts – Stocks Based & Dynamic Yield Based

Total Assets Under Management	Total Annual Fee
\$250,000 - \$399,999	1.65%
\$400,000 - \$599,999	1.50%
\$600,000 - \$999,999	1.40%
\$1,000,000 - \$1,999,999	1.30%
\$2,000,000 - \$4,999,999	1.15%
\$5,000,000 and Above	Negotiable

These fees are negotiable depending upon the needs of the client and complexity of the situation and the final fee schedule is attached as Exhibit I of the Investment Advisory

Contract. Fees are paid monthly in advance. Advisory fees are withdrawn directly from the client's accounts with client written authorization. Our employees and their family related accounts are charged a reduced fee for our services.

If a Client terminates, fees that are collected in advance will be refunded based on the prorated amount of work completed up to the day of termination within the month terminated. In addition, Clients may terminate their contracts without penalty, for full refund, within 5 business days of signing the advisory contract.

AMJ is responsible for calculating the fee and delivering instructions to the custodian. At the same time AMJ instructs the custodian to deduct fees from the client's account. Although not our normal practice, we do accommodate direct billing for a few clients.

Our advisory services are tailored to meet your individual needs. You will have the ability to leave standing instructions with us to refrain from investing in particular industries or invest in limited amounts of securities.

While our advisory services are tailored to you as an individual, when using mutual funds or Exchange Traded Funds ("ETFs") this multi-fund manager approach makes it difficult for us to ensure that your portfolio will not invest in a particular industry or security. However, we are happy to discuss your preferences regarding socially conscious investment concerns and, we'll try as much as possible, to accommodate them.

## **B. Contribution Cost Factors**

The program may cost the client more or less than purchasing such services separately. There are several factors that bear upon the relative cost of the program including the cost of the services if provided separately and the trading activity in the client's account.

## **C. Additional Fees**

In addition, some mutual fund and/or ETF assets deposited in the account may have been subject to deferred sales charges and 12 (b) (1) fees and other annual expenses. These fees are independent of our fees and should be disclosed by the custodian or contained in each fund's prospectus. You should also note that fees for comparable services vary and lower fees for comparable services may be available from other sources.

## **D. Compensation of Client Participation**

Neither AMJ, nor any representatives of AMJ receive any additional compensation for the participation of client's in the wrap fee program. However, compensation received may be more than what would have been received if client paid separately for investment advice, brokerage, and to other services. Therefore, AMJ may have a financial incentive to recommend the wrap fee program to clients.

## **Item 5: Account Requirements and Types of Clients**

AMJ generally provides its wrap fee program services to the following types of clients:

- ❖ Individuals ,Trust, Estates
- ❖ High-Net-Worth Individuals
- ❖ Pension/Profit Sharing Plans
- ❖ Institutions
- ❖ Charitable Organizations

### ***Minimum Account Size***

AMJ generally requires a minimum account size of \$250,000 for this wrap fee program. However, we may accept accounts for less than the minimum if circumstances warrant.

## **Item 6: Portfolio Manager Selection and Evaluation**

### **A. Selecting/Reviewing Portfolio Managers**

AMJ will not select any outside portfolio managers for management of this wrap fee program. Angela M. Bender is the sole portfolio manager for this wrap fee program.

#### ***1. Standards Used to Calculate Portfolio Manager Performance***

AMJ will use industry standards to calculate portfolio manager performance.

#### ***2. Review of Performance Information***

AMJ reviews the performance information to determine and verify its accuracy and compliance with presentation standards. The performance information is reviewed monthly and is reviewed by AMJ

### **B. Related Persons**

No outside persons act as a portfolio manager for the wrap fee program as described in this brochure. As such, there are no conflicts of interest with outside persons and AMJ will not select any outside persons as portfolio managers for this wrap fee program.

### **C. Advisory Business**

AMJ offers investment supervisory services to its wrap fee program participants as detailed in Item 4 above. AMJ generally limits its investment advice and/or money management to mutual funds, equities, bonds, fixed income, debt securities, options, ETFs, real estate, hedge funds, REITs, insurance products including annuities, private

placements, and government securities. AMJ may use other securities as well to help diversify a portfolio when applicable.

### ***Financial Planning***

AMJ provides clients the opportunity for comprehensive financial planning or issue specific planning. AMJ also tactically manages client assets to mitigate downside pressure while positioning them for the positive movement in the markets momentum. AMJ benchmarks their client plans at least annually to the investment performance to determine if the client's financial planning goals are on track. Financial plans and financial planning may include, but are not limited to: investment planning, life insurance; tax concerns; retirement planning; college planning; and debt/credit planning. These services are based on fixed fees or hourly fees and the final fee structure is documented in Exhibit A of the Financial Planning Agreement.

### ***Client Tailored Services and Client Imposed Restrictions***

AMJ offers the same suite of services to all of its clients. However, specific client financial plans and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels) and is used to construct a client specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets. Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs.

### ***Wrap Fee Programs***

A wrap fee program is an investment program where the investor pays one stated fee that may include management fees, transaction costs, fund expenses, and any other administrative fees.

AMJ participates in wrap fee programs; which is an investment program where the investor pays one stated fee that includes management fees, fund expenses, and any other administrative fees. AMJ does manage the investments in the wrap fee program. AMJ does not manage those wrap fee accounts any differently than non-wrap fee accounts. All of the fees paid to the wrap account program will be given to AMJ as a management fee.

### ***Performance Based Fees***

AMJ does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

### ***Methods of Analysis***

AMJ's methods of analysis and research include macro economic analysis, fundamental analysis, and quantitative evaluation analysis.

### ***Macro Economic Research Process***

We utilize research from the top firms on Wall Street to guide our Macro Economic Sector weightings.

### **Fundamental Research Process**

We take a bottom up approach to the research of equity selections. After our screening process is completed, we utilize research from Thompsons and S&P to evaluate the companies and determine if they are included into our Value Growth- Blend Strategy.

### **Quantitative Evaluation Process**

Finally the stock selections are put through our quantitative evaluation process that weights our selections by 11 sectors and looks for the best risk adjusted time to enter or exit a position. If all processes of the analysis signals a buy we enter the position and are long the equity until one of the evaluations breaks down. We then exit and push to cash equivalents to await our next equity entry position.

### ***Investment Strategies***

AMJ uses long term trading, short term trading, margin transactions, and options writing (including covered options, uncovered options, or spreading strategies).

Long term trading is designed to capture market rates of both return and risk. Frequent trading, when done, can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

Short term trading, margin transactions, and options writing generally hold greater risk and clients should be aware that there is a material risk of loss using any of those strategies.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

### ***Material Risks Involved***

Investing in securities involves risk of loss which you should be prepared to bear. Our past performance is not a guarantee of future results. Investing in securities (including stocks, bonds, mutual funds and ETFs) involves risk of loss. Further, different types of investments involve varying degrees of risk. Clients and prospective clients should prepare to bear investment loss including loss of original principal.

There are principal and material risks involved with investing which may adversely affect the account value and total return of your portfolio(s). There are other circumstances (including additional risks that are not described here) which could prevent your portfolios from achieving its investment objective. It is important to read all the disclosure information provided and to understand that you may lose money by investing in the any of our strategies.

Your account is subject to the following risks:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.



- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic, and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

### ***Risks of Specific Securities Utilized***

AMJ generally seeks investment strategies that do not involve significant or unusual risk beyond that of the general domestic and/or international equity markets. However, it will utilize margin transactions and options writing which generally hold greater risk of capital loss and clients should be aware that there is a material risk of loss using any of those strategies.

**Mutual Funds:** Investing in mutual funds carries the risk of capital loss. Mutual funds are not guaranteed or insured by the FDIC or any other government agency. You can lose money investing in mutual funds. All mutual funds have costs that lower investment returns. They can be of bond "fixed income" nature (lower risk) or stock "equity" nature (mentioned above).

**Equity** investment generally refers to buying shares of stocks by an individual or firms in return for receiving a future payment of dividends and capital gains if the value of the stock increases. There is an innate risk involved when purchasing a stock that it may decrease in value and the investment may incur a loss.

**Treasury Inflation Protected/Inflation Linked Bonds:** The Risk of default on these bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal.

**Fixed Income** is an investment that guarantees fixed periodic payments in the future that may involve economic risks such as inflationary risk, interest rate risk, default risk, repayment of principal risk, etc.

**Debt securities** carry risks such as the possibility of default on the principal, fluctuation in interest rates, and counterparties being unable to meet obligations.

**Stocks & Exchange Traded Funds (ETF):** Investing in stocks & ETF's carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Investments in these securities are not guaranteed or insured by the FDIC or any other government agency.

**Real Estate** funds face several kinds of risk that are inherent in this sector of the market. Liquidity risk, market risk and interest rate risk are just some of the factors that can influence the gain or loss that is passed on to the investor. Liquidity and market risk tend to have a greater effect on funds that are more growth-oriented, as the sale of appreciated properties depends upon market demand. Conversely, interest rate risk impacts the amount of dividend income that is paid by income-oriented funds.

**Hedge Funds** are not suitable for all investors and involve a high degree of risk due to several factors that may contribute to above average gains or significant losses. Such factors include leveraging or other speculative investment practices, commodity trading, complex tax structures, a lack of transparency in the underlying investments, and generally the absence of a secondary market.

**REITs** have specific risks including valuation due to cash flows, dividends paid in stock rather than cash, and the payment of debt resulting in dilution of shares.

**Private placements** carry a substantial risk as they are largely unregulated offerings not subject to securities laws.

**Precious Metal ETFs** (Gold, Silver, Palladium Bullion backed "electronic shares" not physical metal): Investing in precious metal ETFs carries the risk of capital loss.

**Long term trading** is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various other types of risk that will typically surface at various intervals during the time the client owns the

investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

**Short term trading** risks include liquidity, economic stability and inflation.

**Margin transactions** use leverage that is borrowed from a brokerage firm as collateral. Margin transactions carry an implicit risk since there is no guarantee that the principal will be repaid.

**Options writing** involve a contract to purchase a security at a given price, not necessarily at market value, depending on the market. If the future value of the underlying security decreases, the purchaser is still obligated to pay the elevated price.

**1031 Exchanges** allows you to sell appreciated investment real estate (or personal property) and defer the payment of your capital gain taxes by acquiring like-kind replacement property. There are very specific requirements that you must follow so that your sale transaction will qualify for 1031 Tax Deferred Exchange treatment under Section 1031 of the Internal Revenue Code (tax code).

**Past performance is not a guarantee of future returns. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

### *Voting Client Proxies*

AMJ may accept authority to vote proxies with respect to securities owned by Clients.

We have adopted proxy voting policies and procedures with respect to securities owned by our Clients for which we have been specifically delegated voting authority and discretion, in accordance with its fiduciary duties and Securities and Exchange Commission Rule 206(4)-6 under the Investment Advisers Act of 1940, which are reasonably designed to ensure that proxies are voted in the best interest of Clients.

The guiding principle by which we vote on all matters submitted to security holders is the maximization of the ultimate economic value of your holdings. We do not permit voting decisions to be influenced in any matter that is contrary to, or dilutive of, this guiding principle. It is the policy to avoid situations where there is any material conflict of interest or perceived conflict of interest affecting the voting decisions. The Chief Investment Officer, or delegate reviews and votes proxies.

It is the general policy that we vote on all matters presented to security holders in any Proxy, and these policies and procedures have been designed with that in mind. However, we reserve the right to abstain on any particular vote or otherwise withhold its vote on any matter if in the judgment of AMJ, the costs associated with voting such Proxy outweigh the benefits you, or if the circumstances make such an abstention or withholding otherwise advisable and in the best interests of you, in our judgment.

Clients delegate to AMJ the discretionary power to vote the securities held in their account pursuant to written agreement. AMJ does not accept any subsequent directions on matters presented to shareholders for a vote, regardless of whether such subsequent directions are from the Client itself or a third party.

Upon request, we will provide separately to each Client (i) a copy of AMJ's proxy voting policies and procedures and (ii) details as to how the firm has voted securities in your account.

## **Item 7: Client Information Provided to Portfolio Managers**

Angela M. Bender is the portfolio manager for this wrap fee program. All client information that is collected, including basic information, risk tolerance, sophistication level, and income level will be collected by Angela M. Bender. As that information changes and is updated, Angela M. Bender will have immediate access to that information once collected.

## **Item 8: Client Contact with Portfolio Managers**

AMJ places no restrictions on client ability to contact its portfolio manager. Angela M. Bender can be contacted during regular business hours and their contact information is on the cover page of their ADV 2B supplement brochure documents.

## **Item 9: Additional Information**

### **A. Disciplinary Action and Other Financial Industry Activities**

#### ***Criminal or Civil Actions***

There are no criminal or civil actions to report.

#### ***Administrative Proceedings***

There are no administrative proceedings to report.

#### ***Self-regulatory Organization (SR) Proceedings***

There are no self-regulatory organization proceedings to report.

#### ***Registration as a Broker/Dealer or Broker/Dealer Representative***

Angela M. Bender, Ibtasam Mahmood and Fridtjov Markussen are registered representatives of Triad Advisors, LLC.

### ***Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor***

Neither AMJ nor its representatives are registered as or have pending applications to become a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor.

### ***Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests***

Certain IAR's of the firm are registered representatives of Triad Advisors, LLC. From time to time, they will offer clients advice or products from those activities. Clients should be aware that these services pay a commission and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. AMJ always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of AMJ in their capacity as a registered representative.

Certain AMJ IAR's are also licensed insurance agents. From time to time, they will offer clients advice or products from those activities. Clients should be aware that these services pay a commission and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. AMJ always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of AMJ in their capacity as a licensed insurance agent. Please note AMJ's IARs will be appropriately licensed to sell insurance products in the states the insurance products are being offered.

### ***Selection of Other Advisors or Managers and How This Adviser is Compensated for Those Selections***

AMJ can utilize other advisers or third party managers and is compensated under an advisory agreement. See Item #4 of the Firm's 2A Brochure.

## **B. Code of Ethics, Review of Accounts, Client Referrals and Financial Information**

### ***Code of Ethics***

We have a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual

Review, and Sanctions. Our Code of Ethics is available free upon request to any client or prospective client.

From time to time, representatives of AMJ may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of AMJ to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. AMJ will always document any transactions that could be construed as conflicts of interest and will always transact client business before their own when similar securities are being bought or sold, unless securities are traded alongside with clients and receive the same pricing.

From time to time, representatives of AMJ may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of AMJ to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. AMJ will always transact client's transactions before its own when similar securities are being bought or sold, unless securities are traded alongside with clients and receive the same pricing.

***Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)***

AMJ receives research, products, or other services from its broker/dealer or another third-party in connection with client securities transactions ("soft dollar benefits"). There is no minimum client number or dollar number that AMJ must meet in order to receive free research from the custodian or broker/dealer. There is no incentive for AMJ to direct clients to this particular broker-dealer over other broker-dealers who offer the same services. However, because this firm does not have to produce or pay for services or products it has an incentive to choose a custodian that provides those services based on its interests rather than the clients' interests. The first consideration when recommending broker/dealers to clients is best execution. AMJ always acts in the best interest of the client.

- a. When using client brokerage commissions (or markups or markdowns) to obtain research or other products or services, AMJ receives a benefit because it does not have to produce or pay for the research, products or services.
- b. AMJ may have an incentive to select or recommend a broker-dealer based on its interest in receiving the research or other products or services, rather than its clients' interest in receiving most favorable execution.
- c. AMJ does not cause clients to pay commissions (or markups or markdowns) higher than those charged by other broker-dealers in return for soft dollar benefits.
- d. AMJ acquired no products and services with client brokerage commissions in the last fiscal year.

### ***Compensation to Non – Advisory Personnel for Client Referrals***

AMJ does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

### ***Review of Accounts***

Client accounts are reviewed at least quarterly by Angela M. Bender and/or other investment adviser representatives. The chief advisors are instructed to review clients' accounts with regards to their investment policies and risk tolerance levels. All accounts at AMJ are assigned to this reviewer.

At the Annual review, we discuss all of these points with our clients and talk about our expectations for the coming year. Any adjustments to risk tolerance or income need that our clients may have is addressed and the portfolio rebalanced to reflect any changes.

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

Each client will receive at least monthly or quarterly from the custodian, a written report that details the client's account including assets held and asset value which will come from the custodian.

### ***Balance Sheet***

AMJ does not require nor solicit prepayment of more than \$1,200 in fees per client, six months or more in advance and therefore does not need to include a balance sheet with this brochure.

### ***Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients***

Neither AMJ nor its management have any financial conditions that are likely to reasonably impair our ability to meet contractual commitments to clients.

### ***Bankruptcy Petitions in Previous Ten Years***

AMJ has not been the subject of a bankruptcy petition in the last ten years.