

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.

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.adviserinfo.sec.gov.

NARRATIVE BROCHURE

Form ADV Part 2A

Updated March 31, 2024

WJ ***Interests, LLC***
WEALTH ADVISORS

wjwealth.com

wj@wjwealth.com

281-634-9400

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

MATERIAL CHANGES

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Annual update

This brochure dated March 31, 2024, 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 the last update on March 24, 2023:

1. Updated "Assets we manage" from \$426 million to \$484 million

Full brochure available

This brochure is available:

1. Through WJ's website at www.wjwealth.com as a downloadable PDF.
2. By sending a request to 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.

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ADVISORY BUSINESS

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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 Jared W. Jameson, William O. (Bill) Jameson, and Jonathan F. Chapman.

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.

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- Establishment of a WJ Client Investment Portal summarizing the consolidated performance for all of your accounts managed by WJ Interests.
- Regular updates of the financial planning items identified above as you request them, such as a review of your goals and objectives, and updates of your financial planning checklist and cash flow.

Tailored relationships

All 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, 2023, WJ Interests managed the following amount of assets:

| | |
|----------------------|---------------|
| Discretionary | \$484 million |
| Non-Discretionary | \$0 |
| Total Assets Managed | \$484 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.

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FEES AND COMPENSATION

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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 0.65% per year. The asset-based fee is dependent upon the amount of assets we manage for you.

This is our standard fee which is negotiable based on the complexity of the wealth management 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. WJ retains the discretion to negotiate fees on a client-by-client basis.

Billing and types of payments

The wealth management fee is due at the beginning of each calendar quarter, specifically January 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, as valued by the custodian. Whenever valuation information for specific, illiquid, foreign, private or other investments is not available through pricing services or custodians, WJ has developed policies to value these investments using other sources. 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

FEES AND COMPENSATION

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

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

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PERFORMANCE-BASED FEES AND SIDE BY SIDE MANAGEMENT

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

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TYPES OF CLIENTS

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Description

We provide financial planning and investment management services to:

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

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METHODS OF ANALYSIS

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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.

METHODS OF ANALYSIS

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In addition, portfolio investments can be concentrated, and diversification can be limited. There are no limits with respect to position sizes. Any assets or combination of assets that can be held in a securities account can be purchased or sold.

Client accounts generally maintain significant cash positions from time-to-time. Clients will pay the Investment Management Fee based upon the net asset value of the Account, including cash and cash equivalents. The Account can also forego investment opportunities to hold cash positions if we consider it in the best interests of the Accounts.

Investing in securities involves risk of loss that clients should be prepared to bear. 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.

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DISCIPLINARY INFORMATION

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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.

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CODE OF ETHICS, PARTICIPATION IN CLIENT TRANSACTIONS AND PERSONAL TRADING

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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.

Personal conduct rule

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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:

- 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.

A written copy of our Code of Ethics is available upon request.

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OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

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.

Third Party Ratings

WJ Interests and its advisors receive awards and honors from time to time from various third party marketing firms and/or publications. These awards and honors are based on the third party's criteria established solely at their discretion. When using third-party ratings in advertisements, WJ will disclose the criteria used, the rating date, and the third party providing the rating. WJ does not pay directly or indirectly for the ratings.

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BROKERAGE PRACTICES

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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.

Many of our clients use Charles Schwab & Co., Inc. (Schwab), a FINRA registered broker-dealer, as the qualified custodian. We are independently owned and operated and not affiliated with Schwab and Schwab will hold your assets in a brokerage account and buy and sell securities when we/you instruct them to. While we recommend that you use Schwab as custodian/broker, you will decide whether to do so and open your account with Schwab by entering into an account agreement directly with them. We do not open the account for you. Even though your account is maintained at Schwab, we can still use other brokers to execute trades for your account.

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Your Brokerage Costs

For our clients' accounts that Schwab maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. Certain trades (for example, many mutual funds and ETFs) may not incur Schwab commissions or transaction fees. Schwab is also compensated by earning interest on the uninvested cash in your account. Your accounts at Schwab benefit because the overall commission rates you pay are lower than they would be otherwise. In addition to commissions, Schwab may charge you a flat dollar amount as a "prime broker" or "trade away" fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your Schwab account. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we have Schwab execute most trades for your account. We have determined that having Schwab execute most trades is consistent with our duty to seek "best execution" of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above.

Soft dollars:

Products and Services Available to Us from Schwab

Schwab's business is serving independent investment advisory firms like us. They provide us and our clients with access to its institutional brokerage – trading, custody, reporting and related services – many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our clients' accounts while others help us manage and grow our business. Schwab's support services are generally available on an unsolicited basis (we don't have to request them) and at no charge to us as long as we keep our clients' assets in accounts at Schwab. Here is a more detailed description of Schwab's support services:

Services that Benefit You

Schwab's brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab includes some to which we might not otherwise have access or that would require a

BROKERAGE PRACTICES

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significantly higher minimum initial investment by our clients. Schwab's services described in this paragraph generally benefit you and your account.

Our Interest in Schwab's Services

The availability of these services from Schwab benefits us because we do not have to produce or purchase them. We do not have to pay for Schwab's services so long as we keep client assets in accounts at Schwab. This may give us an incentive to recommend that you maintain your account with Schwab based on our interest in receiving Schwab's services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest. We believe, however, that our selection of Schwab as custodian and broker is in the best interests of our clients.

Benefits Received from Schwab

Schwab will provide the following: i) services to support the transition and opening of accounts to and from WJ, and ii) technology, marketing, research and compliance related expenses. The Adviser has no obligation to deal with any broker or group of brokers in executing transactions in portfolio securities.

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:

- 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:

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- 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.

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REVIEW OF ACCOUNTS

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Periodic reviews and review triggers

WJ uses a software tool to monitor client accounts. The software provides periodic notices of client contributions, withdrawals, or significant changes in asset allocation. Additional reviews are prompted by volatile market conditions, changes in your goals and objectives, or changes in our model portfolios. Accounts are reviewed by Jared Jameson, CEO and CCO, or Jonathan Chapman at least on a quarterly basis.

WJ meets monthly to set investment policy for the coming month. The meetings, referred to as Tactical Asset Allocation (TAA) meetings, generally 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 WJ Notes and our investment emails. 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 provides at least quarterly 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.

REVIEW OF ACCOUNTS

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

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.

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CLIENT REFERRALS AND OTHER COMPENSATION

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

As stated above in “Brokerage Practices”, 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, 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.

CLIENT REFERRALS AND OTHER COMPENSATION



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.

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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.

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- 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

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- 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.

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INVESTMENT DISCRETION

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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.

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VOTING CLIENT SECURITIES

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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. Portfolio 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.

VOTING CLIENT SECURITIES

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

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

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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.
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.

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- 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 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.

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.

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FINANCIAL INFORMATION

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Financial condition

WJ does not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance.

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.

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PRIVACY STATEMENT

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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.

BUSINESS CONTINUITY PLAN DISCLOSURE

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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.schwaballiance.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.