

## **WJ Financial Advisors, LLC**

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**Firm Brochure**  
(Part 2A of Form ADV)

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### **Item 1: Cover Page**

This brochure provides information about the qualifications and business practices of WJ Financial Advisors, LLC. If you have any questions about the contents of this brochure, please contact us at: (860) 663-3646, or by email at: [wj@wjadvisors.com](mailto:wj@wjadvisors.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 Financial Advisors, LLC is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2: Material Changes**

Since the last annual filing of this brochure (September 2023), AUM has increased due to both market conditions and adding several new clients.

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## Item 4: Advisory Business

WJ Financial Advisors, LLC (“WJFA” or the “Firm”) was founded in 2006 with the objective of delivering outstanding financial solutions, centered on individual attention. WJFA’s principal owners are Wallace Jones, Joseph Giaccone and Jennifer Elles-Jones. Jennifer Elles-Jones is not active in the day-to-day operations of the firm.

### Types of Advisory Services

WJFA is strictly a fee-only Financial Planning and Investment Management firm. The firm does not sell annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products. The firm is not affiliated with entities that sell financial products or securities. No commissions in any form are accepted. No finder’s fees are accepted.

#### **INVESTMENT MANAGEMENT**

WJFA offers Investment Management and Financial Planning to Clients. WJFA will offer Clients ongoing Investment Management and Financial Planning services through determining individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, asset allocation, portfolio monitoring and the overall investment program will be based on the above factors.

##### **Discretionary Management**

When the Client elects to use WJFA on a discretionary basis, the Client will sign a limited trading authorization or equivalent allowing WJFA to determine the securities to be bought or sold and the amount of the securities to be bought or sold. WJFA will have the authority to execute transactions in the account without seeking Client approval on each transaction.

#### **FINANCIAL PLANNING AND CONSULTING**

Financial planning services include an evaluation of a Client's current and future financial state will be provided by using currently known variables to predict future cash flows, asset values and withdrawal plans. WJFA will use current net worth, tax liabilities, asset allocation, and future retirement and estate plans in developing financial plans. Topics generally reviewed in a financial plan may include but are not limited to:

- **Financial goals:** Based on an individual's or a family's clearly defined financial goals, including funding a college education for the children, buying a larger home, starting a business, retiring on time, or leaving a legacy. Financial goals should be quantified and set to milestones for tracking.
- **Personal net worth statement:** A snapshot of assets and liabilities serves as a benchmark for measuring progress towards financial goals.
- **Cash flow analysis:** An income and spending plan determines how much can be set aside for debt repayment, savings, and investing each month.

- **Retirement strategy:** A strategy for achieving retirement independent of other financial priorities. Including a strategy for accumulating the required retirement capital and its planned lifetime distribution.
- **Comprehensive risk management plan:** Identify all risk exposures and provide the necessary coverage to protect the family and its assets against financial loss. The risk management plan includes a full review of life and disability insurance, personal liability coverage, property and casualty coverage, and catastrophic coverage.
- **Long-term investment plan:** Include a customized asset allocation strategy based on specific investment objectives and a risk profile. This investment plan sets guidelines for selecting, buying, and selling investments and establishing benchmarks for performance review.
- **Tax reduction strategy:** Identify ways to minimize taxes on personal income to the extent permissible by the tax code. The strategy should include the identification of tax-favored investment vehicles that can reduce the taxation of investment income.
- **Estate preservation:** Help update accounts, review beneficiaries for retirement accounts and life insurance, provide a second look at your current estate planning documents, and prompt you to update your plan when the legal environment changes or you have major life events such as a marriage, death, or births.

If a conflict of interest exists between the interests of WJFA and the interests of the Client, the Client is under no obligation to act upon WJFA's recommendation. If the Client elects to act on any of the recommendations, the Client is under no obligation to affect the transaction through WJFA. Financial plans will be completed and delivered within ninety (90) days, contingent upon timely delivery of all required documentation.

### **ERISA PLAN SERVICES**

WJFA offers service to qualified and non-qualified retirement plans, including 401(k) plans, 403(b) plans, pension, and profit-sharing plans, cash balance plans, and deferred compensation plans. WJFA may act as a 3(21) advisor:

**Limited Scope ERISA 3(21) Fiduciary.** WJFA acts as a limited-scope ERISA 3(21) fiduciary that can advise, help, and assist plan sponsors with their investment decisions. As an investment advisor, WJFA has a fiduciary duty to act in the best interest of the Client. The plan sponsor is still ultimately responsible for the decisions made in their plan, though using WJFA can help the plan sponsor delegate liability by following a diligent process.

1. Fiduciary Services are:

- Provide investment advice to the Client about asset classes and investment alternatives available for the Plan in accordance with the Plan's investment policies and objectives. Clients will make the final decision regarding the initial selection, retention, removal, and addition of investment options. WJFA acknowledges that it is a fiduciary as defined in ERISA section 3 (21) (A) (ii).

- Assist the Client in the development of an investment policy statement (“IPS”). The IPS establishes the investment policies and objectives for the Plan. Client shall have the ultimate responsibility and authority to establish such policies and objectives and to adopt and amend the IPS.
- Provide investment advice to the Plan Sponsor with respect to the selection of a qualified default investment alternative for participants who are automatically enrolled in the Plan or who have otherwise failed to make investment elections. The Client retains the sole responsibility to provide all notices to the Plan participants required under ERISA Section 404(c)(5) and 404(a)-5.
- Assist in monitoring investment options by preparing periodic investment reports that document investment performance, consistency of fund management and conformance to the guidelines set forth in the IPS and make recommendations to maintain, remove or replace investment options.
- Meet with the Client on a periodic basis to discuss the reports and the investment recommendations.

2. Non-fiduciary Services are:

- Assist in the education of Plan participants about general investment information and the investment alternatives available to them under the Plan. Client understands WJFA’s assistance in education of the Plan participants shall be consistent with and within the scope of the Department of Labor’s definition of investment education (Department of Labor Interpretive Bulletin 96-1). As such, WJFA is not providing fiduciary advice as defined by ERISA 3(21)(A)(ii) to the Plan participants. WJFA will not provide investment advice concerning the prudence of any investment option or combination of investment options for a particular participant or beneficiary under the Plan.
- Assist in the group enrollment meetings designed to increase retirement plan participation among the employees and investment and financial understanding by the employees.

WJFA may provide these services or, alternatively, may arrange for the Plan’s other providers to offer these services, as agreed upon between WJFA and Client.

3. WJFA has no responsibility to provide services related to the following types of assets (“Excluded Assets”):

- Employer securities;
- Real estate (except for real estate funds or publicly traded REITs);
- Stock brokerage accounts or mutual fund windows;
- Participant loans;
- Non-publicly traded partnership interests;
- Other non-publicly traded securities or property (other than collective trusts and similar vehicles); or
- Other hard-to-value or illiquid securities or property.

Excluded Assets will **not** be included in calculation of Fees paid to WJFA on the ERISA Agreement. Specific services will be outlined in detail to each plan in the 408(b)2 disclosure.

## **Tailored Advisory Services**

The goals and objectives for each Client are documented in our Client files. Investment strategies are created that reflect the stated goals and objectives. Clients may impose restrictions on investing in certain securities or types of securities. These restrictions may, however, prohibit engagement with WJFA.

## **Assets under Management**

As of December 31, 2023, WJFA manages approximately \$126,209,314 million in discretionary assets under management. No assets are managed on a non-discretionary basis. Assets under advisement (AUA) are \$145,145,175.

## **Item 5: Fees and Compensation**

### **Investment Management/Financial Planning Fees (Combined Services)**

WJFA offers Investment Management/Financial Planning Services to advisory Clients for a combined fee. WJFA charges this combined annual Investment Management/Financial Planning Services fee based on the total assets under management. The annual fee is negotiable based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with Clients, etc.). WJFA will not charge more than 1.25% annually to any client.

Combined Investment Management/Financial Planning Services fees are billed quarterly in arrears based on the average market value of the accounts during the quarter. The average market value of accounts are determined by adding the account values from the last day of each month within the quarter, then dividing the total by three. Invoices are sent to clients each quarter and are payable within 15 calendar days after the end of the quarter. Fees for partial quarters at commencement or termination of the relationship will be pro-rated based on the number of days services were provided. Current client relationships may exist where the fees and methods of fee calculation differ from the information listed above.

Fees CAN BE deducted from a designated client account or paid via check. Due to specific client requests, the Firm has established direct fee payment arrangements with client accounts held at Charles Schwab & Co. Inc. Current client relationships may exist where the fees are higher or lower than the fee schedule above.

An initial introduction and consultation is free of charge and is considered an exploratory interview to determine the extent to which financial planning and investment management may be beneficial to the client.

## Financial Planning (Stand-Alone Service)

WJFA charges an hourly, ongoing, and/or fixed fee for financial planning and consulting. Prior to the planning process the Client will be provided an estimated plan fee which will be based on the complexity of the engagement. For hourly and fixed fee arrangements, services will be completed and delivered within ninety (90) days contingent upon timely delivery of all required documentation. WJFA reserves the right to waive the fee should the Client implement the plan through WJFA.

### **HOURLY FEES**

Hourly Fee Services are offered based on an hourly fee range of \$125 to \$375 per hour. Fees for financial plans are billed upon completion of the plan OR upon execution of the Agreement OR 50% in advance with the balance due upon plan delivery.

### **FIXED FEES**

Fixed Fee Services are offered based on a range of \$1,500 - \$15,000 depending on the complexity of the engagement. Fees are billed 50% payable at the signing of the agreement with the balance due upon plan delivery.

### **ONGOING FEES**

Ongoing Fee Services are offered as an annual fee, based on the Client's individual circumstances and needs. Ongoing fees are charged quarterly depending on the Client's election. Fees are billed in arrears for each billing period. Ongoing Fee Services will continue year over year until canceled, in writing, by either WJFA or the Client.

## ERISA Plan Services

The annual fees are based on the market value of the Included Assets and shall not exceed 1%. Fees may be charged quarterly or monthly in arrears or in advance based on the assets as calculated by the custodian or record keeper of the Included Assets (without adjustments for anticipated withdrawals by Plan participants or other anticipated or scheduled transfers or distribution of assets) on the last business day of the previous quarter.

The fee schedule, which includes compensation of WJFA for the services is described in detail in the ERISA Plan Agreement. The Plan is obligated to pay the fees; however, the Plan Sponsor may elect to pay the fees. Clients may elect to be billed directly or have fees deducted from Plan Assets. WJFA does not reasonably expect to receive any additional compensation, directly or indirectly, for its services. If additional compensation is received, WJFA will disclose this compensation, the services rendered, and the payer of compensation.

## Additional Fees

Custodians may charge brokerage commissions, transaction fees, and other related costs on the purchases or sales of mutual funds, equities, bonds, options, margin interest, and exchange-traded funds. Mutual funds, money market funds, and exchange-traded funds may also charge internal management fees, which are disclosed in the fund's prospectus. WJFA does not receive any compensation from these fees. All of these fees are in addition to the management fee you pay to WJFA. For more details on the brokerage practices, see Item 12 of this brochure.



## **Prepayment of Fees**

WJFA does not expect Clients to prepay fees.

## **External Compensation for the Sale of Securities**

WJFA does not receive any external compensation from the sale of securities.

## **Item 6: Performance-Based Fees and Side-By-Side Management**

WJFA does not charge any performance-based fees or engage in side-by-side management.

## **Item 7: Types of Clients**

### **Description**

WJFA provides personalized confidential financial planning and investment management to individuals, pension and profit-sharing plans, trusts, estates, charitable organizations, not-for-profit corporate entities, and small businesses. Client relationships vary in scope and length of service.

### **Account Minimums**

WJFA does not have established minimum account size requirements.

## **Item 8: Methods of Analysis, Investment Strategies and Risk of Loss**

### **Methods of Analysis**

Security analysis methods may include charting, fundamental analysis, technical analysis, and cyclical analysis. The main sources of information include financial newspapers and magazines, inspections of corporate activities, research materials prepared by others, corporate rating services, timing services, annual reports, prospectuses, filings with the Securities and Exchange Commission, and company press releases.

### **Investment Strategies**

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time. Each client executes a Target Asset Allocation that documents their objectives and their desired investment strategy.

Asset allocation is emphasized in the investment management process at the Firm. The use of low-cost, passive-index funds is central to the construction of client portfolios. A target asset allocation is established based upon the client's financial needs, risk tolerance and desired return. Based upon prevailing market conditions and in the judgment of WJFA, decisions will be made to overweight, or underweight certain asset allocation categories.

For certain clients, other strategies may include long-term purchases, short-term purchases, trading, short sales, margin transactions, and option writing (including covered options, uncovered options, or spreading strategies).

## Risk of Loss

Investing in securities involves risk of loss that Clients should be prepared to bear. WJFA's investment approach constantly keeps the risk of loss in mind. Investors may face the following investment risks:

**General Investment and Trading Risks.** Clients may invest in securities and other financial instruments using strategies and investment techniques with significant risk characteristics. The investment program utilizes such investment techniques as option transactions, margin transactions, short sales, leverage, and derivatives trading, the use of which can, in certain circumstances, maximize the adverse impact to which a Client may be subject.

**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.

**Inflation Risk.** When any type of inflation is present, a dollar today will buy more than 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.

**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.

**Management Risk.** The advisor's investment approach may fail to produce the intended results. If the advisor's assumptions regarding the performance of a specific asset class or fund are not realized in the expected time frame, the overall performance of the Client's portfolio may suffer.

**Cybersecurity Risk.** WJFA and its service providers may be subject to operational and information security risks resulting from cyberattacks. Cyberattacks include, among other behaviors, stealing or corrupting data maintained online or digitally, denial of service attacks on websites, the unauthorized release of confidential information or various other forms of cybersecurity breaches. Cybersecurity attacks affecting WJFA, and its service providers may adversely impact Clients. For instance, cyberattacks may interfere with the processing of transactions, cause the release of private information about Clients, impede trading, subject WJFA to regulatory fines or financial losses, and cause reputational damage. Similar types

of cybersecurity risks are also present for issuers of securities in which Clients may invest in, qualified custodians, governmental and other regulatory authorities, exchange and other financial market operators, or other financial institutions. Cybersecurity incidents that could ultimately cause them to incur losses, including for example: financial losses, cost and reputational damages, and loss from damage or interruption of systems. Although WJFA has established its systems to reduce the risk of these incidents from coming to fruition, there is no guarantee that these efforts will always be successful, especially considering that WJFA does not directly control the cybersecurity measures and policies employed by third party service providers.

**Options Trading.** The risks involved with trading options are that they are very time sensitive investments. An options contract is generally a few months. The buyer of an option could lose his or her entire investment even with a correct prediction about the direction and magnitude of a particular price change if the price change does not occur in the relevant time period (i.e., before the option expires). Additionally, options are less tangible than some other investments. An option is a “book-entry” only investment without a paper certificate of ownership.

**Trading on Margin.** In a cash account, the risk is limited to the amount of money that has been invested. In a margin account, risk includes the amount of money invested plus the amount that has been loaned. As market conditions fluctuate, the value of marginable securities will also fluctuate, causing a change in the overall account balance and debt ratio. As a result, if the value of the securities held in a margin account depreciates, the Client will be required to deposit additional cash or make full payment of the margin loan to bring the account back up to maintenance levels. Clients who cannot comply with such a margin call may be sold out or bought in by the brokerage firm.

**Exchange-Traded Funds.** ETFs are a type of index fund bought and sold on a securities exchange. The risks of owning an ETF generally reflect the risks of owning the underlying securities they are designed to track, although lack of liquidity in an ETF could result in it being more volatile and ETFs have management fees that increase their costs. ETFs are also subject to other risks, including: (i) the risk that their prices may not correlate perfectly with changes in the underlying reference units; and (ii) the risk of possible trading halts due to market conditions or other reasons that, in the view of the exchange upon which an ETF trades, would make trading in the ETF inadvisable.

**Mutual Fund Risks.** An investment in mutual funds could lose money over short or even long periods. A mutual fund’s share price and total return are expected to fluctuate within a wide range, like the fluctuations of the overall stock market.

**Common Stocks and Equity-Related Securities.** Certain ETFs or mutual funds hold common stock. Prices of common stock react to the economic condition of the company that issued the security, industry and market conditions, and other factors which may fluctuate widely. Investments related to the value of stocks may rise and fall based on an issuer’s actual and anticipated earnings, changes in management, the potential for takeovers and acquisitions, and other economic factors. Similarly, the value of other equity-related securities, including preferred stock, warrants, and options may also vary widely.

**Small- and Mid-Cap Risks.** Certain ETFs and mutual funds hold securities of small- and mid-cap issuers. Securities of small-cap issuers may present greater risks than those of large-cap issuers. For example, some small- and mid-cap issuers often have limited product lines, markets, or financial resources. They may be subject to high volatility in revenues, expenses, and earnings. Their securities may be thinly traded, may be followed by fewer investment research analysts, and may be subject to wider price swings and thus may create a greater chance of loss than when investing in securities of larger-cap issuers. The market prices of securities of small- and mid-cap issuers generally are more sensitive to changes in earnings expectations, to corporate developments, and to market rumors than are the market prices of large-cap issuers.

**Futures, Commodities, and Derivative Investments.** Certain ETFs and mutual funds hold commodities, commodities contracts, and/or derivative instruments, including futures, options, and swap agreements. The prices of commodities contracts and derivative instruments, including futures and options, are highly volatile. Payments made pursuant to swap agreements may also be highly volatile. Price movements of commodities, futures and options contracts, and payments pursuant to swap agreements are influenced by, among other things, interest rates, changing supply and demand relationships, trade, fiscal, monetary and exchange control programs and policies of governments, and national and international political and economic events and policies. The value of futures, options, and swap agreements also depends upon the price of the commodities underlying them. In addition, Client assets are subject to the risk of the failure of any of the exchanges on which its positions trade or of its clearinghouses or counterparties.

**Highly Volatile Markets.** The prices of financial instruments can be highly volatile. Price movements of forward and other derivative contracts are influenced by, among other things, interest rates, changing supply and demand relationships, trade, fiscal, monetary and exchange control programs and policies of governments, and national and international political and economic events and policies. Clients are also subject to the risk of failure of any of the exchanges on which their positions trade or of its clearinghouses.

**Non-U.S. Securities.** Certain ETFs and mutual funds hold securities of non-U.S. issuers. Investments in securities of non-U.S. issuers pose a range of potential risks which could include expropriation, confiscatory taxation, imposition of withholding or other taxes on dividends, interest, capital gains or other income, political or social instability, illiquidity, price volatility, and market manipulation. In addition, less information may be available regarding securities of non-U.S. issuers, and non-U.S. issuers may not be subject to accounting, auditing and financial reporting standards, and requirements comparable to or as uniform as those of U.S. issuers.

**Emerging Markets.** Certain ETFs and mutual funds hold securities of emerging markets issuers. In addition to the risks associated with investments outside of the United States, investments in emerging markets (i.e., the developing countries) may involve additional risks. Emerging markets generally are not as efficient as those in developed countries. In some cases, a market for the security may not exist locally, and transactions will need to be made on a neighboring exchange. Volume and liquidity levels in emerging markets are lower than in developed countries. When seeking to sell emerging market securities, little or

no market may exist for the securities. In addition, issuers based in emerging markets are not generally subject to uniform accounting and financial reporting standards, practices, and requirements comparable to those applicable to issuers based in developed countries, thereby potentially increasing the risk of fraud or other deceptive practices.

**Capitalization Risks.** Investing in Companies within the same market capitalization category carries the risk that the category may be out of favor due to current market conditions or investor sentiment.

**Market Risks.** Turbulence in the financial markets and reduced liquidity may negatively affect the Companies, which could have an adverse effect on each of them. If the securities of the Companies experience poor liquidity, investors may be unable to transact at advantageous times or prices, which may decrease the Company's returns. In addition, there is a risk that policy changes by central governments and governmental agencies, including the Federal Reserve or the European Central Bank, which could include increasing interest rates, could cause increased volatility in financial markets, which could have a negative impact on the Companies. Furthermore, local, regional, or global events such as war, acts of terrorism, the spread of infectious illness or other public health issues, recessions, or other events could have a significant impact on the Companies. For example, the rapid and global spread of a highly contagious novel coronavirus respiratory disease, designated COVID-19, has resulted in extreme volatility in the financial markets and severe losses; reduced liquidity of many Companies' securities; restrictions on international and, in some cases, local travel; significant disruptions to business operations (including business closures); strained healthcare systems; disruptions to supply chains, consumer demand and employee availability; and widespread uncertainty regarding the duration and long-term effects of this pandemic. Some sectors of the economy and individual issuers have experienced particularly large losses. In addition, the COVID-19 pandemic may result in a sustained economic downturn or a global recession, domestic and foreign political and social instability, damage to diplomatic and international trade relations and increased volatility and/or decreased liquidity in the securities markets. The Companies' values could decline over short periods due to short-term market movements and over longer periods during market downturns.

## **Item 9: Disciplinary Information**

Neither WJFA nor any of its employees have been involved in any legal or disciplinary events in the past 10 years that would be material to a client's evaluation of the company or its personnel.

## **Item 10: Other Financial Industry Activities and Affiliations**

WJFA has no other financial industry activities or affiliations. Neither WJFA nor its management persons are registered as a broker-dealer or broker-dealer representative. Neither WJFA nor its management persons are registered as futures commission merchant, commodity pool operator, or a commodity trading advisor. Neither WJFA nor its representatives have any material relationships to this advisory business that would present a possible conflict of interest. WJFA does not utilize nor select other advisors.

## **Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

### **Code of Ethics**

The affiliated persons (affiliated persons include employees and/or independent contractors) of WJFA have committed to a Code of Ethics (“Code”). The purpose of our Code is to set forth standards of conduct expected of WJFA affiliated persons and addresses conflicts that may arise. The Code defines acceptable behavior for affiliated persons of WJFA. The Code reflects WJFA and its supervised persons’ responsibility to act in the best interest of their Client.

One area which the Code addresses is when affiliated persons buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our Clients. We do not allow any affiliated persons to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our Clients.

WJFA’s policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other affiliated person, officer, or director of WJFA may recommend any transaction in a security or its derivative to advisory Clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

WJFA’s Code is based on the guiding principle that the interests of the Client are our top priority. WJFA’s officers, directors, advisors, and other affiliated persons have a fiduciary duty to our Clients and must diligently perform that duty to maintain the complete trust and confidence of our Clients. When a conflict arises, it is our obligation to put the Client’s interests over the interests of either affiliated persons or the company.

The Code applies to “access” persons. “Access” persons are affiliated persons who have access to non-public information regarding any Clients’ purchase or sale of securities, or non-public information regarding the portfolio holdings of any reportable fund, who are involved in making securities recommendations to Clients, or who have access to such recommendations that are non-public.

WJFA will provide a copy of the Code of Ethics to any Client or prospective Client upon request.

### **Recommendations Involving Material Financial Interests**

Neither WJFA nor its related persons recommend to Clients, or buys or sells for Client accounts, securities in which WJFA or a related person has a material financial interest.

## **Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest**

WJFA and its affiliated persons may buy or sell securities that are also held by Clients. In order to mitigate conflicts of interest such as trading ahead of Client transactions, affiliated persons are required to disclose all reportable securities transactions as well as provide WJFA with copies of their brokerage statements.

## **Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest**

WJFA does not maintain a firm proprietary trading account and does not have a material financial interest in any securities being recommended and therefore no conflicts of interest exist. However, affiliated persons may buy or sell securities at the same time they buy or sell securities for Clients. In order to mitigate conflicts of interest such as front running, affiliated persons are required to disclose all reportable securities transactions as well as provide WJFA with copies of their brokerage statements.

The Chief Compliance Officer of WJFA is Wallace Jones. Mr. Jones reviews all trades of the affiliated persons each quarter. The personal trading reviews ensure that the personal trading of affiliated persons does not affect the markets and that Clients of WJFA receive preferential treatment over associated persons' transactions.

## **Item 12: Brokerage Practices**

### **Factors Used to Select or Recommending Broker-Dealers**

WJFA may recommend the use of a specific broker-dealers or may utilize a broker-dealer of the Client's choosing. WJFA will select appropriate brokers based on a number of factors including but not limited to their transaction fees, quality of customer service, and reporting ability. WJFA relies on the broker-dealer to provide its execution services at the best prices available. Lower fees for comparable services may be available from other sources. Specific custodian recommendations are made to Clients based on their need for such services, however, final decision on selection of custodian remains with the client. Clients pay for any and all custodial fees in addition to the advisory fee charged by WJFA.

The Firm participates in the Schwab Institutional (SI) services program offered to independent investment advisors by Charles Schwab & Company, Inc. ("Schwab"), a FINRA-registered broker-dealer. Clients in need of brokerage and custodial services will generally have Schwab recommended to them due to Schwab's:

- Discounted commission structure
- Arrangements with multiple mutual fund families to trade through Schwab
- Financial stability
- Provision of account information online to all clients
- Client service to the Firm and its clients
- Ease of reporting to the Firm and its clients

As part of the SI program, the Firm receives benefits that it would not receive if it did not offer investment advice.

## Research and Other Soft-Dollar Benefits

WFJA currently has no formal soft-dollar arrangements, where specific products or services are paid for with soft dollars generated for the Firm by individual trades the Firm places in client accounts. However, custodians provide the Firm with certain brokerage and research products and services that qualify as "brokerage or research services" under Section 28(e) of the Securities Exchange Act of 1934 ("Exchange Act").

Schwab provides the Firm with access to its institutional trading and custody services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the advisor's clients' assets are maintained in accounts at Schwab Institutional. These services are not contingent upon the Firm committing to Schwab any specific amount of business (assets in custody or trading commissions). Schwab's brokerage services include the execution of securities transactions, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

For the Firm's client accounts maintained in its custody, Schwab generally does not charge separately for custody services but is compensated by account holders through commissions or other transaction-related or asset-based fees for securities trades that are executed through Schwab or that settle into Schwab accounts.

Schwab also makes available to the Firm other products and services that benefit the Firm but may not directly benefit its clients' accounts. Many of these products and services may be used to service all or some substantial number of the Firm's accounts.

Schwab's products and services that assist the Firm in managing and administering clients' accounts include software and other technology that:

- Provide access to client account data (such as trade confirmations and account statements)
- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- Provide research, pricing, and other market data
- Facilitate payment of the Firm's fees from its clients' accounts
- Assist with back-office functions, recordkeeping, and client reporting

Schwab Institutional also offers other services intended to help the Firm manage and further develop its business enterprise. These services may include:

- Compliance, legal and business consulting
- Publications and conferences on practice management and business succession
- Access to employee benefits providers, human capital consultants and insurance providers.



Schwab may make available, arrange and/or pay third-party vendors for the types of services rendered to the Firm: Schwab Institutional may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to the Firm. Schwab Institutional may also provide other benefits such as educational events or occasional business entertainment of Firm personnel. In evaluating whether to require that clients custody their assets at Schwab, the Firm may take into account the availability of some of the foregoing products and services and other arrangements as part of the total mix of factors it considers and not solely the nature, cost or quality of custody and brokerage services provided by Schwab, which may create a potential conflict of interest.

## **Brokerage for Client Referrals**

WJFA does not receive Client referrals from any custodian or third party in exchange for using that broker-dealer or third party.

## **Directed Brokerage**

WJFA does not generally accept directed brokerage arrangements (when a Client requires that account transactions be effected through a specific broker-dealer). However, WJFA does allow for Client directed brokerage in certain situations. Such situations may affect WJFA's ability to negotiate commissions with the resulting inability to obtain volume discounts or best execution for Client directed accounts in some transactions. Therefore, a Client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case should the Client elect to trade through the broker-dealer WJFA recommends.

Typically, WJFA recommends that clients direct the Firm to execute transactions through their primary custodians, Schwab, Vanguard, or Fidelity.

## **Order Aggregation**

WJFA may aggregate brokerage orders for its clients and allocate the securities purchased or sold among the participating accounts, with each account receiving the same terms. Since Schwab does not charge transaction fees at the account level whether or not a trade is placed as a block trade, aggregating trades does not affect client transaction fees. The proportion in which participating accounts will share transactions will be determined by the portfolio manager(s) on the basis of investment objectives, cash availability, expected cash and liquidity needs, and other relevant factors. The overarching principle for that allocation is that no client is intentionally favored over another client that is similarly situated.

## **Item 13: Review of Accounts**

### **Periodic Reviews**

Account reviews are performed monthly by Wallace Jones, CFA, President, Managing Member, and CCO of WJFA. When market conditions become more volatile, account reviews may occur more frequently. A written evaluation of each client's initial situation may be provided to the client. Periodic reviews are also

communicated to provide reminders of the specific courses of action that need to be taken. More frequent reviews occur but are not necessarily communicated to the client unless immediate changes are recommended.

## **Review Triggers**

Other events that may trigger a special review include changes in client financial conditions, tax law changes, or other new information.

## **Regular Reports**

Clients receive quarterly summaries from WJFA which align account data with asset allocation and performance data. Clients also receive written account statements no less than quarterly for managed accounts. Account statements are issued by the Client's custodian. Client receives confirmations of each transaction in account from Custodian and an additional statement during any month in which a transaction occurs. Client should compare the WJFA performance reports to their custodial statements for accuracy and alert WJFA to any discrepancies immediately.

## **Item 14: Client Referrals and Other Compensation**

WJFA only receive compensation and economic benefits from clients in exchange for advisory services.

WJFA may compensate persons or firms for Client referrals in compliance with the Adviser's Act and state securities rules and regulations. The fees paid to referral sources do not affect the fees Clients pay to WJFA. In each instance, a written agreement will exist between the Advisor and the referral source. Client's referred to WJFA through any solicitor will be notified of such an agreement and any conflicts with their arrangement at the time of referral through verbal or written disclosures.

## **Item 15: Custody**

Custody is defined as having any access to client funds or securities. Because WJFA generally has the authority to instruct the account custodian to deduct the investment management fee directly from the client's account, WJFA is considered to have "custody" of client assets. This limited access is monitored by the client through receipt of account statements directly from the custodian. These statements all show the deduction of the management fee from the account. Otherwise, WJFA may only direct the movement of funds from one account in the client's name to another such titled account but has no other access to funds. All assets are held at qualified custodians. The custodians provide account statements directly to clients at their address of record at least quarterly.

When clients receive their statements from the account custodian, clients should carefully review those statements and take the time to compare them with those they receive from WJFA. If the client finds significant discrepancies, the custodian and WJFA should be notified.

Additionally, some clients have provided their custodian with standing instructions for WJFA to move assets from their account(s) to accounts of third parties. (This includes sending Required Minimum Distributions from an individual's IRA account to an account held jointly with a spouse or partner.) Because these standing instructions do not specify the amount or timing of the transfers, WJFA is also deemed to have custody over the sending accounts. This is mitigated by WJFA and the custodian following appropriate custody rules, which do not require that the sending accounts be surprise examined annually by a public accounting firm.

## **Item 16: Investment Discretion**

### **Discretionary Authority for Trading**

WJFA accepts discretionary authority to manage securities accounts on behalf of clients. For these discretionary accounts, the Firm has full trading authority under a limited power of attorney assigned to WJFA. As a result, WJFA has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. The Firm follows the investment strategy as set forth in the investment management agreement. Clients may place restrictions on the Firm's discretion in writing.

Non-discretionary accounts are managed for clients not willing or unable to provide limited power of attorney to WJFA. For these Non-discretionary accounts, WJFA consults with the client prior to each trade to obtain concurrence if a blanket trading authorization has not been given.

## **Item 17: Voting Client Securities**

### **Proxy Votes**

WJFA has the authority to vote client securities (proxies) when clients grant the Firm such authority for accounts held at Schwab. For Clients who custody their accounts at other custodians, WJFA will not have the authority to vote proxies for the Client. A conflict exists when WJFA recommends that a Client use custodians other than Schwab as a Client voting proxies for themselves may not be in their best interest. However, this conflict is mitigated by WJFA's fiduciary duty to act in the clients best interest. Therefore, any recommendations of a custodian other than Schwab to a client will be based on other factors that WJFA has considered to make such a recommendation.

When it is determined that voting a proxy is in the relevant clients' best interests, WJFA generally votes with management recommendations; however, clients can direct the Firm on how to vote. If a conflict of interest exists, it will be disclosed to the client. Exceptions will be evaluated and documented on a case-by-case basis in consultation with the Chief Compliance Officer. At any time, clients may request a copy of the Firm's Proxy Voting Policies and Procedures.

Clients may also choose to maintain their authority to vote their securities on their own. When assistance on voting proxies is requested, WJFA will provide recommendations to the Client.

## **Item 18: Financial Information**

### **Financial Condition**

WJFA does not require or solicit fees of more than \$1,200.00 per client six months or more in advance. WJFA has never filed for bankruptcy and is not aware of any financial condition that is reasonably likely to impair the Firm's ability to meet the contractual commitments to clients.

# **Wallace Jones, CFA**

## **Brochure Supplement**

(Part 2B of Form ADV)

**255 Route 80**  
**Killingworth, CT 06419**  
**(860) 663-3646**  
[www.wjadvisors.com](http://www.wjadvisors.com)  
[wj@wjadvisors.com](mailto:wj@wjadvisors.com)

## **March 2024**

This brochure supplement provides information about Wallace Jones that supplements the WJ Financial Advisors brochure. You should have received a copy of that brochure. Please contact Wallace Jones if you did not receive WJ Financial's brochure or if you have any questions about the contents of this supplement.

Additional information about Wallace Jones is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2: Educational Background and Business Experience

### Wallace C. Jones, Born: 1973

#### Educational Background:

- BS in Business Administration with Majors in Finance, Marketing, and International Business; Minor in Theology; cum laude; Georgetown University, Washington, DC - 1995
- MBA with concentrations in Finance, Entrepreneurship and Management & Strategy; Kellogg Graduate School of Management, Northwestern University, Evanston, IL – 2000

#### Business Experience:

- Founder; WJ Financial Advisors, LLC (2006-present)
- Chief Financial Officer; Resolute Partners, LLC (2005-2006);
- Director, Business Development; Resolute Partners, LLC (2004-2005);
- Manager; Ernst & Young, LLP Economics & Business Analytics Advisory Services (2002-2004);
- Investment Banking Associate; Adams, Harkness & Hill, Boston, MA (2000-2002);
- Consultant / Senior Consultant; Ernst & Young, LLP, Washington, DC (1995-1999)

Wallace Jones holds the Series 65 - Uniform Investment Adviser Law License. The Series 65 (formally known as the Uniform Investment Advisor Law License) is administered as a registered exam and securities license required by most U.S. states for individuals who act as investment advisors. The material covers laws, regulations, ethics, and topics such as retirement planning, portfolio management and fiduciary responsibilities. The exam is designed by the North American Securities Administrators Association (NASAA) and is administered by the Financial Industry Regulatory Authority (FINRA).

Wallace Jones is a CFA Charterholder. The Chartered Financial Analyst (CFA®) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute—the largest global association of investment professionals.

To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

#### **High Ethical Standards**

The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA charterholders to:

- Place their clients' interests ahead of their own
- Maintain independence and objectivity
- Act with integrity
- Maintain and improve their professional competence
- Disclose conflicts of interest and legal matters

**Comprehensive and Current Knowledge**

The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning. To learn more about the CFA charter, visit [www.cfainstitute.org](http://www.cfainstitute.org).

**Item 3: Disciplinary Information**

Wallace Jones has no disciplinary or legal events to disclose.

**Item 4: Other Business Activities**

Wallace Jones serves as an independent outside Director at Liberty Bank.

**Item 5: Additional Compensation**

Wallace Jones receives compensation for his work at Liberty Bank.

**Item 6: Supervision**

Wallace Jones is the President, Managing Member, and Chief Compliance Officer of the Firm and is not supervised.

# **Joseph D. Giaccone**

## **Brochure Supplement**

(Part 2B of Form ADV)

**255 Route 80  
Killingworth, CT 06419  
(860) 663-3646  
[www.wjadvisors.com](http://www.wjadvisors.com)  
[jg@wjadvisors.com](mailto:jg@wjadvisors.com)**

## **March 2024**

This brochure supplement provides information about Joseph Giaccone that supplements the WJ Financial Advisors brochure. You should have received a copy of that brochure. Please contact Joseph Giaccone if you did not receive WJ Financial's brochure or if you have any questions about the contents of this supplement.

Additional information about Joseph Giaccone is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).



## **Item 2: Educational Background and Business Experience**

### **Joseph D. Giaccone , Born: 1971**

#### Educational Background:

- BS in Business Administration with a concentration in Ethics from Providence College, 1993

#### Business Experience:

- Investment Advisor Representative, WJ Financial Advisors, LLC (2014-present)
- Vice President–Senior Relationship Manager, Wells Fargo & Co. (2000-2014)

Joseph Giaccone holds the Series 65 - Uniform Investment Adviser Law License. The Series 65 (formally known as the Uniform Investment Advisor Law License) is administered as a registered exam and securities license required by most U.S. states for individuals who act as investment advisors. The material covers laws, regulations, ethics, and topics such as retirement planning, portfolio management and fiduciary responsibilities. The exam is designed by the North American Securities Administrators Association (NASAA) and is administered by the Financial Industry Regulatory Authority (FINRA).

## **Item 3: Disciplinary Information**

Joseph Giaccone has no disciplinary or legal events to disclose.

## **Item 4: Other Business Activities**

Joseph Giaccone has no outside business activities which generate revenue to disclose.

## **Item 5: Additional Compensation**

Joseph Giaccone receives no compensation beyond that received from WJ Financial Advisors.

## **Item 6: Supervision**

Joseph Giaccone is supervised by Wallace Jones, President, Managing Member, and Chief Compliance Officer of the Firm. Wallace Jones can be reached by phone at (860) 663-3646 or by email at [wj@wjadvisors.com](mailto:wj@wjadvisors.com). Supervision includes (i) monitoring the investments recommended by Joseph Giaccone to ensure they are suitable for the particular client and consistent with their objectives, goals, investment needs and risk tolerance, as well as any restrictions requested by the client, and (ii) reviewing the advisory activities of Joseph Giaccone, which includes a review of client accounts and correspondence (including e-mails) sent and received by Joseph Giaccone.

# **Brandon J. LaChance**

## **Brochure Supplement**

(Part 2B of Form ADV)

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**Killingworth, CT 06419**  
**(860) 663-3646**  
**[www.wjadvisors.com](http://www.wjadvisors.com)**  
**[bl@wjadvisors.com](mailto:bl@wjadvisors.com)**

## **March 2024**

This brochure supplement provides information about Brandon LaChance that supplements the WJ Financial Advisors brochure. You should have received a copy of that brochure. Please contact Brandon LaChance if you did not receive WJ Financial's brochure or if you have any questions about the contents of this supplement.

Additional information about Brandon LaChance is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2: Educational Background and Business Experience**

### **Brandon J. LaChance , Born: 1999**

#### Educational Background:

- BS in Finance from Central Connecticut State University, 2021

#### Business Experience:

- Investment Advisor Representative, WJ Financial Advisors, LLC (2023-present)
- Client Services Specialist, Johnson Brunetti (2019-2023)

Brandon LaChance holds the Series 65 - Uniform Investment Adviser Law License. The Series 65 (formally known as the Uniform Investment Advisor Law License) is administered as a registered exam and securities license required by most U.S. states for individuals who act as investment advisors. The material covers laws, regulations, ethics, and topics such as retirement planning, portfolio management and fiduciary responsibilities. The exam is designed by the North American Securities Administrators Association (NASAA) and is administered by the Financial Industry Regulatory Authority (FINRA).

## **Item 3: Disciplinary Information**

Brandon LaChance has no disciplinary or legal events to disclose.

## **Item 4: Other Business Activities**

Brandon LaChance has no outside business activities which generate revenue to disclose.

## **Item 5: Additional Compensation**

Brandon LaChance receives no compensation beyond that received from WJ Financial Advisors.

## **Item 6: Supervision**

Brandon LaChance is supervised by Wallace Jones, President, Managing Member, and Chief Compliance Officer of the Firm. Wallace Jones can be reached by phone at (860) 663-3646 or by email at [wj@wjadvisors.com](mailto:wj@wjadvisors.com). Supervision includes (i) monitoring the investments recommended by Brandon LaChance to ensure they are suitable for the particular client and consistent with their objectives, goals, investment needs and risk tolerance, as well as any restrictions requested by the client, and (ii) reviewing the advisory activities of Brandon LaChance, which includes a review of client accounts and correspondence (including e-mails) sent and received by Brandon LaChance.