

## **Firm Brochure**

(Part 2A of Form ADV)



**Trajan Wealth, L.L.C.**

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This brochure provides information about the qualifications and business practices of Trajan Wealth, L.L.C. Being registered as a registered investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at 480-214-9835 or by email at: [jeff@trajanwealth.com](mailto:jeff@trajanwealth.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 Trajan Wealth, L.L.C. (IARD # 158847) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

March 31, 2017

Trajan Wealth, L.L.C.

## **Item 2: Material Changes**

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### **Annual Update**

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure. Each year, we will ensure that you receive a summary of any material changes to this and subsequent brochures by April 30<sup>th</sup>. We will further provide you with our most recent brochure at any time at your request, without charge. You may request a brochure by contacting us at (480) 214-9835 or [jeff@trajanwealth.com](mailto:jeff@trajanwealth.com).

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### **Material Changes since the Last Update**

Since the last Annual Update dated March 14, 2016, Trajan Wealth, LLC has had the following material changes:

- None

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### **Full Brochure Available**

This Firm Brochure being delivered is the complete brochure for the Firm.

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## **Item 4: Advisory Business**

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### **Firm Description**

Trajan Wealth, L.L.C., (“TW”) is a Registered Investment Advisor based in Scottsdale, Arizona, and incorporated under the laws of the State of Arizona. Founded in 2010, TW provides investment advice to primarily individuals which may include, but are not limited to, determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, and estate planning. Our investment advice is tailored to meet our clients’ needs and investment objectives.

The firm changed its name in 2011 from Valley Financial Wealth Management L.L.C. Jeffrey B. Junior is 100% owner. TW is registered with the Securities and Exchange Commission, and subject to its rules and regulations.

TW is also a licensed insurance agency wholly owned by Jeffrey B. Junior.

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### **Types of Advisory Services**

#### **Asset Management Services**

TW provides investment advisory and portfolio management services on a continuing basis, which may include the review of client investment objectives and goals, recommending asset allocation strategies of managed assets among investment products such as cash, stocks, mutual funds, bonds, and annuities. Our investment advice is tailored to meet our clients’ needs and investment objectives. Clients may impose restrictions on investing in certain securities or types of securities (such as a product type, specific companies, specific sectors, etc.) by providing a signed and dated written notification, of which an e-mail is also an acceptable form of notification.

TW provides investment advisory and other financial services through its Investment Advisory Representatives (“IAR”) to accounts opened with TW. Managed Accounts are available to individuals.

TW provides discretionary investment advisory services to its clients through various managed account programs. TW will assist clients in determining the suitability of the Managed Account Programs for the client. The IAR is compensated through a comprehensive single fee and the account may be assessed other charges associated with conducting a brokerage business. TW and its IAR, as appropriate, will be responsible for the following:

- Performing due diligence

- Recommending strategic asset and style allocations
- Providing research on investment product options, as needed
- Providing client risk profile questionnaire
- Obtaining investment advisory contract from client with required financial, risk tolerance, suitability and investment vehicle selection information for each new account
- Performing client suitability check on account documentation, reviewing the investment objectives and evaluating the investment vehicle selections
- Providing a Firm Brochure (this document)

#### *Sub-Advisers*

TW, in providing the services agreed upon with the client, may retain hereafter ("the sub-adviser"), an investment adviser registered under applicable securities laws, as a sub-adviser to manage all or a portion of the managed assets in the Client's account. If this occurs, TW will be responsible for the continuing supervision of the Client's account, and the actions of the sub-adviser in connection with the Client's account and the managed assets. TW also will be responsible for the payment of any advisory fee or other charges of the sub-adviser with respect to the managed assets unless or except as specifically authorized in advance by the Client. TW agrees that upon proper notice by the Client, TW will refrain from the appointment of, or terminate as permitted under applicable contracts, any sub-adviser appointed pursuant to this authority.

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

The goals and objectives for each client are documented in our client files. Investment strategies are created that reflect the stated goals and objective. Clients may impose restrictions on investing in certain securities or types of securities with written notification.

Agreements may not be assigned without written client consent.

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### **Wrap Fee Programs**

TW does sponsor a Wrap Fee Program, and the Wrap Fee Program may or may not be managed similarly to the non-Wrap Fee Program accounts. A "wrap fee program" for purposes of the SEC is a program under which investment advisory and brokerage execution services are provided for a single "wrapped" fee that is not based on the transactions in a client account. TW offers some of its clients wrap accounts through third party money managers ("sub-advisers") through a managed account program, or through its own sponsored program. TW will assist clients in determining the suitability of the TW Wrap Fee Program for the client.

A separate Wrap Fee Program brochure is provided to those clients interested in the Wrap Fee Programs.

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## **Client Assets under Management**

As of March 1, 2017, TW had the following Assets under Management:

Discretionary: \$135,902,000

Non-Discretionary: \$0

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

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### **Method of Compensation and Fee Schedule**

The total annual advisory fees charged to the client are based on a percentage of assets under management as follows:

<b>Assets Under Management</b>	<b>Annual Advisory Fee *</b>
\$0 - \$1,000,000	1.30%
Next \$1,000,001 - \$2,000,000	1.00%
Next \$2,000,001 +	0.75%

- \*a \$100 annual fee will be assessed on all accounts with values below \$50,000. This fee is used to cover technology costs. This may equate to be more than the maximum stated 2% as stated in the ADV and Investment Advisory Agreement.

The annual fee is assessed on a quarterly schedule and calculated on the client's average daily balance. For example, a client with a \$2,000,000 portfolio will be charged 1.30% annually or .325% per quarter on the first \$1,000,000, and then 1.00% annually or .25% per quarter on the second \$1,000,000. With your written authorization, the custodian automatically deducts the advisory fee from your account quarterly, and distributes the above stated fee to TW. The fees may be negotiated lower than the fees stated in the above fee schedule.

Discounts, not generally available to our advisory clients, may be offered to family members and associated persons of our firm.

The minimum account value is \$10,000 for asset management services.



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## **Client Payment of Fees**

With written authorization, we will automatically deduct our fee from your account through the qualified custodian holding your funds and securities. These fees will be deducted quarterly in arrears. The authorization and method of payment will be documented in the Investment Advisory Agreement.

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## **Additional Client Fees Charged**

In addition to advisory fees paid to TW as explained above, clients may pay custodial service, account maintenance, transaction, and other fees associated with maintaining the account. These fees vary by broker and/or custodian. Clients should ask TW for details on transaction fees or other custodial fees specific to their account, as these fees are not included in the annual advisory fee. TW does not share any portion of such fees. Additionally, for any mutual funds purchased, the client may pay their proportionate share of the funds' distribution, internal management, investment advisory and administrative fees. Such fees are not shared with TW and are compensation to the fund manager. Clients are urged to read the mutual fund prospectus prior to investing.

Mutual fund companies impose internal fees and expenses on clients. These fees are in addition to the costs associated with the investment advisory services as described above. Complete details of such internal expenses are specified and disclosed in each mutual fund company's prospectus. Clients are strongly advised to review the prospectus(es) prior to investing in such securities.

Mutual funds purchased or sold in broker-dealer accounts may generate transaction fees that would not exist if the purchase or sale were made directly with the mutual fund company. Mutual funds held in broker-dealer accounts also charge management fees. These mutual fund management fees may be more or less than the mutual fund management fees charged if the client held the mutual fund directly with the mutual fund company.

Clients may purchase shares of mutual funds directly from the mutual fund issuer, its principal underwriter, or a distributor without purchasing the services of TW or paying the advisory fee on such shares (but subject to any applicable sales charges). Certain mutual funds are offered to the public without a sales charge. In the case of mutual funds offered with a sales charge, the prevailing sales charge (as described in the mutual fund prospectus) may be more or less than the applicable advisory fee. However, clients would not receive TW's assistance in developing an investment strategy, selecting securities, monitoring performance of the account, and making changes as necessary.

Please refer to Item 12 "Brokerage Practices" of this brochure for additional information.

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**Prepayment of Client Fees**

TW does not require any prepayment of client fees.

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**External Compensation for the Sale of Securities to Clients**

TW does not receive any external compensation for the sale of securities to clients, nor do any of the investment advisor representatives of TW.

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**Item 6: Performance-Based Fees**

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**Sharing of Capital Gains**

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

TW does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

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**Item 7: Types of Clients**

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**Description**

TW primarily provides investment advice to individuals.

Client relationships vary in scope and length of service.

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**Account Minimums**

The minimum account value is \$10,000.

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

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**Methods of Analysis and Investment Strategies**

Security analysis methods used by TW may include fundamental analysis, technical analysis, and cyclical analysis. Investing in securities involves risk of loss that clients should be prepared to bear.

Fundamental analysis involves evaluating a stock using real data such as company revenues, earnings, return on equity, and profits margins to determine underlying value and potential growth. Technical analysis involves evaluating securities based on past prices and volume. Cyclical analysis involves analyzing the cycles of the market.

The main sources of information may include financial newspapers and magazines, research materials prepared by others, corporate rating services, annual reports, prospectuses, and filings with the Securities and Exchange Commission.

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### **Investment Strategy and Method of Analysis Material Risks**

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 an Investment Policy Statement, Risk Tolerance or other documentation as required by TW that documents the client's objectives and their desired investment strategy.

Fundamental analysis may involve interest rate risk, market risk, business risk, and financial risk. Risks involved in technical analysis are inflation risk, reinvestment risk, and market risk. Cyclical analysis involves inflation risk, market risk, and currency risk. Other strategies may include long-term purchases, short-term purchases, trading, and option writing (including covered options, uncovered options or spreading strategies).

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### **Security Specific Material Risks**

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- *Interest-rate Risk:* Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- *Market Risk:* The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- *Inflation Risk:* When any type of inflation is present, a dollar today will 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.
- *Business Risk:* These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- *Liquidity Risk:* Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- *Financial Risk:* Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Our strategies and investments may have unique and significant tax implications. Regardless of your account size or other factors, we strongly recommend that you continuously consult with a tax professional prior to and throughout the investing of your assets.

Investing in securities involves risk of loss that clients should be prepared to bear. Although we manage your portfolio with strategies and in a manner consistent with your risk tolerances, there can be no guarantee that our efforts will be successful. You should be prepared to bear the risk of loss.

All investments involve the risk of loss, including (among other things) loss of principal, a reduction in earnings (including interest, dividends, and other distributions), and the loss of future earnings. These risks include the risks stated above. Regardless of the methods of analysis or strategies suggested for your particular investment goals, you should carefully consider these risks, as they all bear risks.

## **Item 9: Disciplinary Information**

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### **Criminal or Civil Actions**

The firm and its management have not been involved in any criminal or civil action.

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**Administrative Enforcement Proceedings**

The firm and its management have not been involved in administrative enforcement proceedings.

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**Self Regulatory Organization Enforcement Proceedings**

The firm and its management have not been involved in legal or disciplinary events related to past or present investment clients.

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

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**Broker-Dealer or Representative Registration**

Neither TW nor any of its employees are registered representatives of a broker-dealer.

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**Futures or Commodity Registration**

TW nor its employees are registered or have an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

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**Material Relationships Maintained by this Advisory Business and Conflicts of Interest**

Jeffrey B. Junior has a financial industry affiliated business as an insurance agent with Trajan Wealth, LLC. Not more than 50% of his time is spent on these activities. From time to time, he and/or his Investment Advisor Representative(s) offer clients advice or products from those activities. He and/or his Investment Advisor Representative(s) may receive separate yet typical compensation in the form of finder's fees for the sale of insurance products.

These practices represent conflicts of interest because it gives TW an incentive to recommend products based on the compensation amount received. This conflict is mitigated by the fact that TW has a fiduciary responsibility to place the best interest of the client first and the clients are not required to purchase any insurance products. Clients have the option to purchase these products through another insurance agent of their choosing.

Jeffrey B. Junior is 50% owner of another Registered Investment Advisor, Foundations Investment Advisors, LLC. Foundations Investment Advisors, LLC is also registered with the Securities and Exchange Commission.

Jeffrey B. Junior is also the owner of Trajan Tax, LLC. Trajan Tax, LLC provides tax services for clients. Clients are not obligated to utilize the services of Trajan Tax, LLC.

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**Recommendations or Selections of Other Investment Advisors and Conflicts of Interest**

TW does not select or recommend the services of other registered investment advisors.

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

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**Code of Ethics Description**

The employees of TW have committed to a Code of Ethics ("Code"). The purpose of our Code is to set forth standards of conduct expected of TW employees and addresses conflicts that may arise. The Code defines acceptable behavior for employees of TW. The Code reflects TW and its supervised persons' responsibility to act in the best interest of their client.

One area which the Code addresses is when employees buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our clients. We do not allow any employees 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.

TW's policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other employee, officer or director of TW 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.

TW's Code is based on the guiding principle that the interests of the client are our top priority. TW's officers, directors, advisors, and other employees 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 employees or the company.

The Code applies to "access" persons. "Access" persons are employees 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.

The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

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**Investment Recommendations Involving a Material Financial Interest and Conflict of Interest**

TW and its employees do not recommend to clients securities in which we have a material financial interest.

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

TW and its employees may buy or sell securities that are also held by clients. In order to mitigate conflicts of interest such as trading ahead of client trades, employees are required to disclose all reportable securities transactions as well as provide TW with copies of their brokerage statements.

The Chief Compliance Officer of TW is Jeff Junior. He reviews all employee trades each quarter. The personal trading reviews ensure that the personal trading of employees does not affect the markets and that clients of the firm receive preferential treatment over employee transactions.

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

TW 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.

**Item 12: Brokerage Practices**

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**Factors Used to Select Broker-Dealers for Client Transactions**

- *Directed Brokerage*  
You may direct us in writing to use a particular broker-dealer to execute some or all of the transactions for your account. If you do so, you are responsible for negotiating the terms and arrangements for the account with that broker-dealer. We may not be able to negotiate commissions, obtain volume discounts, or best execution. In addition, under these circumstances a difference in commission charges may exist between the commissions charged to clients who direct us to use a particular broker or dealer and other clients who do not direct us to use a particular broker or dealer.
- *Best Execution*  
Investment advisors who manage or supervise client portfolios on a discretionary basis have a fiduciary obligation of best execution. TW recommends the brokerage and custodial services of TD Ameritrade. TD Ameritrade maintains custody of all

funds and securities. We believe that TD Ameritrade provides quality execution services for you at competitive prices. Price is not the sole factor we consider in evaluating best execution. We also consider the quality of the brokerage services provided by TD Ameritrade, including the value of research provided, the firm's reputation, execution capabilities, commission rates, reporting capabilities, and responsiveness to our clients and our firm. In recognition of the value of research services and additional brokerage products and services TD Ameritrade provides, you may pay higher commissions and/or trading costs than those that may be available elsewhere.

- *Soft Dollar Arrangements*  
TW does not maintain any soft dollar arrangements

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### **Aggregating Securities Transactions for Client Accounts**

When TW buys or sells the same security for two or more clients (including our personal accounts), we may place concurrent orders to be executed together as a single "block" in order to facilitate orderly and efficient execution. Each client account will be charged or credited with the average price per unit. We receive no additional compensation or remuneration of any kind because we aggregate client transactions, and no client is favored over any other client.

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

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### **Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved**

Account reviews are performed quarterly by the Investment Advisor Representative assigned to the account. Account reviews are performed more frequently when market conditions dictate.

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### **Review of Client Accounts on Non-Periodic Basis**

Other conditions that may trigger a review of clients' accounts are changes in the tax laws, new investment information, and changes in a client's own situation.

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### **Content of Client Provided Reports and Frequency**

Clients receive account statements no less than quarterly for managed accounts from the Custodian. Account reports may be issued by TW. Client receives confirmations of each transaction in account from the custodian and an additional statement during any month in which a transaction occurs.



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

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### **Economic benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest**

TW does not receive any economic benefits from external sources.

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### **Advisory Firm Payments for Client Referrals**

TW may enter into “Solicitor/Finder” relationships. These individual solicitors offer our services to the public. TW pays a referral fee to the solicitor or finder based on its advisory fee and written agreement. Clients may pay higher or lower fees when working with a solicitor. The final fee schedule will be disclosed in the client agreement. TW will charge the total fee to the client and pay the solicitor/finder their share of the total fee. Solicitor/finders will also be appropriately registered under federal and state securities laws where applicable. Client receives all related agreements and disclosures prior to or at the time of entering into an Investment Advisory Agreement.

## **Item 15: Custody**

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### **Account Statements**

We directly debit your account(s) for the payment of our advisory fees. This ability to deduct our advisory fees from your accounts causes our firm to exercise limited custody over your funds or securities. We do not have physical custody of any of your funds and/or securities. Your funds and securities will be held with a bank, broker-dealer, or other independent, qualified custodian. You will receive account statements from the independent, qualified custodian(s) holding your funds and securities at least quarterly. The account statements from your custodian(s) will indicate the amount of our advisory fees deducted from your account(s) each billing period. You should carefully review account statements for accuracy. Clients are urged to compare the account statements received directly from their custodians to any performance report statements prepared by TW.

## **Item 16: Investment Discretion**

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### **Discretionary Authority for Trading**

Before TW can buy or sell securities on your behalf, you must first sign our discretionary management agreement, a limited power of attorney, and/or trading authorization forms. By choosing to do so, you may grant the firm discretion over the selection and amount of securities to be purchased or sold for your account(s) without obtaining your consent or approval prior to each transaction. Clients may impose limitations on discretionary authority for investing in certain securities or types of

securities (such as a product type, specific companies, specific sectors, etc.), as well as other limitations as expressed by the client. Limitations on discretionary authority are required to be provided to the IAR in writing. Please refer to the “Advisory Business” section of this Brochure for more information on our discretionary management services.

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

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### **Proxy Votes**

TW does not vote proxies on securities. Clients are expected to vote their own proxies. The client will receive their proxies directly from the custodian of their account or from a transfer agent.

## **Item 18: Financial Information**

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### **Balance Sheet**

A balance sheet is not required to be provided because TW does not serve as a custodian for client funds or securities and TW does not require prepayment of fees of more than \$1,200 per client and six months or more in advance.

### **Financial Conditions Reasonably Likely to Impair Advisory Firm’s Ability to Meet Commitments to Clients**

TW has no condition that is reasonably likely to impair our ability to meet contractual commitments to our clients.

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### **Bankruptcy Petitions during the Past Ten Years**

Neither TW nor its management has had any bankruptcy petitions.

## **Item 19: Requirements for State Registered Advisors**

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**This section is not applicable because the firm is registered with the Securities and Exchange Commission.**

## **Brochure Supplement**

Part 2B of Form ADV

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**Jeffrey B. Junior**

**Trajan Wealth, L.L.C.**  
**9375 E. Shea Blvd, Suite 100**  
**Scottsdale, AZ 85260**  
**PHONE: 480-214-9835**  
**FAX: 480-214-9520**  
**EMAIL: [jeff@trajanwealth.com](mailto:jeff@trajanwealth.com)**  
**WEBSITE: [www.trajanwealth.com](http://www.trajanwealth.com)**

This brochure provides information about Jeffrey B. Junior and supplements the Trajan Wealth, L.L.C.'s brochure. Being registered as a registered investment adviser does not imply a certain level of skill or training. You should have received a copy of that brochure. Please contact Jeffrey B. Junior if you did not receive

Trajan Wealth, L.L.C.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Jeffrey B. Junior (CRD #2940593) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

March 31, 2017

## Brochure Supplement (Part 2B of Form ADV)

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### Additional Investment Advisor Representative

**Jeffrey B. Junior**

- Year of birth: 1975
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### Item 2 Educational Background and Business Experience

Educational Background:

- Campbell University; Degree in General Studies; 1997

Business Experience:

- Trajan Wealth, L.L.C.; Owner/Chief Compliance Officer/Investment Advisor Representative; 07/2012 – Present
  - Trajan Tax, L.L.C.; Owner; 10/2016 - Present
  - Foundations Investment Advisors, LLC; Partner / Chief Compliance Officer; 04/2015 - Present
  - Trajan Wealth L.L.C.; Owner; 08/2011 – 07/2012
  - Trajan Wealth, L.L.C.; Owner/Insurance Agent
  - Trajan Insurance Services, Inc.; Co-Owner/Insurance Agent; 09/2011 – 05/2012
  - Valley Financial Corporation; Owner/Insurance Agent; 03/2010 – 05/2012
  - Transamerica Financial Advisors, Inc.; Managing Principal; 04/2004 – 04/2010
  - National Planning Corp.; Managing Principal; 12/2002 – 04/2004
  - Sun America; Managing Principal; 08/2002 – 12/2002
  - Simmers Capital Management; Vice President; 10/1997 – 08/2002
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### Item 3 Disciplinary Information

None to report

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### Item 4 Other Business Activities

Jeffrey B. Junior has a financial industry affiliated businesses as an insurance agent with Trajan Wealth, L.L.C. Not more than 50% of his time is spent on these activities. From time to time, he offers clients advice or products from those activities. He may receive separate yet typical compensation in the form of finder's fees for the sale of insurance products.

These practices represent conflicts of interest because it gives Mr. Junior an incentive to recommend products based on the compensation amount received. This conflict is mitigated by the fact that Mr. Junior has a fiduciary responsibility to place the best interest of the client first and the clients are not required to purchase any insurance products. Clients have the option to purchase these products through another insurance agent of their choosing.

Jeffrey B. Junior is 50% owner of another Registered Investment Advisor, Foundations Investment Advisors, LLC. Foundations Investment Advisors, LLC is registered with the Arizona Securities Division.

Jeffrey B. Junior is also the owner of Trajan Tax, LLC. Trajan Tax, LLC provides tax services for clients. Clients are not obligated to utilize the services of Trajan Tax, LLC.

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**Item 5 Additional Compensation**

Jeffrey B. Junior does not receive any economic benefit from anyone, who is not a client, for providing advisory services.

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**Item 6 Supervision**

As owner of Trajan Wealth, L.L.C., Jeffrey Junior is responsible for supervision and formulation and monitoring of investment advice offered to clients.

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**Item 7 Requirements for State-Registered Advisors**

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None