

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



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This brochure provides information about the qualifications and business practices of Jamal Elam. If you have any questions about the contents of this brochure, please contact us at 832-714-7476 – Jelam@jamalelam.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 Jamal Elam also is available on the SEC’s website at www.adviserinfo.sec.gov.

***Registered Investment Advisor does not imply a certain level of skill or training.**

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Regulation Best Interest (Reg BI) disclosures are designed to give you a better understanding of how

JE Enterprise (referred to as “we,” “us,” or “our”) offers Public securities to you including:

- The types of products and services we might offer you
- The fees or expenses that might be associated with those offers
- Material facts as to our client relationships and conflicts we may have

Capacity

JE Enterprise is a Firm and a member of FINRA. We connect accredited investors seeking exposure to Registered shares of stock with persons and companies generally on an agency basis. We may conduct limited trading on a principal basis as an accommodation to Clients

The firm will be providing investment advice to clients as an investment adviser and otherwise meets the definition of an investment adviser (Investment Advisers Act Section 202).

Fees and Costs

We charge clients a commission per transaction based on the value of the securities traded. Commissions vary on a transaction-by-transaction basis. The specific commissions and fees you are charged are stated in the documents you receive at the time of the transaction.

In certain cases, we may agree to negotiate shared commissions with other broker-dealers or pay referral fees to third parties.

When necessitated by the transaction, additional fixed fees may be included as part of the execution process and passed onto the responsible parties. For example, if a company charges a transfer fee to complete a transfer or requires a legal opinion, these costs may be charged to the investor.

We may be compensated to act as placement agents by issuers. Such compensation is in addition to the fees and commissions you pay in connection with purchasing an interest in that offering.

In limited circumstances, we may receive a spread or other compensation from principal transactions where the initial buyer customer did not complete the transaction, and we found other substitute buyers willing to transact at a higher price or for additional fees.

Our affiliate Fidelity Investments, an investment management firm that may transact in JE Enterprise, charges fees separate and apart from those charged by us.

Type and Scope of Services

Public Securities are Liquid. Understanding your current financial position helps us to evaluate whether buying or selling public shares makes sense for your portfolio.

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We limit our securities offerings to only approved products. We offer the following services:

- brokering public fund interests of our affiliated funds (“JE Enterprise funds”) to accredited and institutional investors.
- brokering sales of public company securities held by shareholder clients to our affiliated funds as well as directly to accredited and institutional investors; and
- serving as placement agent on behalf of issuers in direct Public securities offerings to accredited and institutional investors.

We do not require a minimum account size, dollar threshold, or other requirements to avoid fees, but we may require a minimum investment to participate in an offering. Investment opportunity minimums are disclosed on our platform for commonly traded companies and upon request for any other company.

Other Material Facts

Our investment offerings are made exclusively to give investors exposure to shares of publicly held companies directly or through a Public Exchange Traded Fund. Investments in public shares and public funds.

- Are subject to the complete loss of your investment.
- Can be highly liquid because of volatility.
- Are subject to restrictions on resale, transfer, withdrawal or redemption of interests; and
- Can be hard to value.

The JE Enterprise funds are offered through a confidential Public placement memorandum (“PPM”). The PPM provides important detailed information regarding risks and other matters and must be read carefully before a decision is made as to whether to invest.

Conflicts of Interest

We attempt to prevent and limit our conflicts of interest; however, conflicts of interest may exist as a result of the nature of the business that we do.

- We earn commissions based on the volume and the price of the transactions. We may have an economic incentive to encourage securities transactions in order to increase these commissions.
- Our employees are generally paid a salary and an annual bonus based on company and individual performance and, at times, may be paid a straight commission from transactions. Employees may have an incentive to generate business to enhance company and individual performance.
- We may offer securities that our related persons may also purchase or sell, creating an incentive to drive prices up or down.

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- Potential conflicts of interest may arise in the process of allocating securities to clients in cases where there is limited supply incentivizing us to favor one client over another.
- We receive transaction fees from our affiliated company Fidelity Investments and, as a minority owner, receive an indirect benefit from the fees it generates. We may be incentivized to encourage transactions related to Fidelity Investments.
- We sometimes act as placement agent for issuers in direct Public securities offerings and are paid a cash fee, typically based on successfully placing a certain amount of securities which incentivizes us to offer these securities.

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- On a limited basis, we may take a short-term principal position to facilitate a transaction for a buyer client. Generally, the buyer client benefits from any gains on the investment; however, if the buyer client chooses not to transact, we may earn more compensation than when trading as an agent, which creates incentives for us to trade on a principal basis.

Our policies and procedures are designed to identify and preclude us from engaging in transactions borne from inappropriate incentives. We have adopted policies and procedures relating to, among other things, trading reviews, personal securities transactions, insider trading, and client communications to identify and mitigate conflicts of interest with clients.