

2026 Disclosure Brochure

For:

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Material Changes

Changes are reflected on an annual basis or amended as needed.

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Advisory Business

JA Investment Management, LLC was founded by John Arthur in 2005. JA Investment Management, LLC is an independent, private financial advisory firm that specializes in private asset management, 401(k) management, and general investment education. As of 12/31/2025- Private Client Assets totaled \$15,125,000. All client accounts are non-discretionary unless verbal or written instructions are given.

Fees & Compensation

JAIM receives compensation solely from clients as a percentage of assets under management. Additions to accounts will be billed at the time of deposit, and ongoing management fees will begin being billed on a quarterly basis *after* the initial deposit. 2026 private management platforms are 1.5% for active management/contact and 1% for passive management/contact. These costs are clearly disclosed on your monthly/quarterly statement. 401(k) clients are billed on a monthly basis. Clients fees are deducted by the custodian (private clients), then forwarded to JAIM. Client fees are the only compensation that JAIM receives, and there are no additional conflicts of interest from outside entities. The custodian of client's accounts could have additional cost that should be considered and reviewed regularly. Private investment recommendations will generally seek no load/no transaction fee mutual funds or exchanged traded funds when taking new positions.

2026 Fee Schedule

Private (Active) **1.5%** *(Non-Negotiable)*

Private (Passive) **1%** *(Non-Negotiable)*

401(k) **1%** *(Negotiable)*

Performance-Based Fees and Side-by-Side Management

JAIM does not participate in performance-based fees and/or side-by-side management.

Types of Clients

JAIM primarily serves individuals and 401(k) plans/participant accounts.

Methods of Analysis, Investment Strategies, and Risk of Loss

Fundamental and technical analysis is the primary methods used to provide investment advice. Investment strategies are tailored to meet each client's individualized needs. Every investment has a risk of loss. It is essential that every client understand all risks associated with a particular investment and continue to educate themselves in an always changing economic environment. Clients should ask questions and fully understand their investment strategy.

Disciplinary Information

JAIM has not been involved in any legal or disciplinary issues.

Other Financial Industry Activities and Affiliations

JAIM does not participate in any other financial industry activities and/or affiliations.

Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

JAIM provides a client contract and rights (which is a blueprint of the responsibilities of JAIM as well as each client's responsibilities). JAIM does not participate or have any interest in client transactions and/or personal trading conflicts.

Brokerage Practices

Private client assets are held by an outside custodian. JAIM is listed at the advisor of record for client's accounts. JAIM receives no commercial or soft dollar benefits from any outside entities. In the event of advisor's death, or the dissolve of JAIM, all client accounts will continue to remain with the current custodian. JAIM would simply be removed as your advisor of record. It is encouraged for clients to seek professional help to further manage their accounts if this event were to occur.

Review of Accounts

Client's accounts/positions are monitored on a daily basis. Clients have the opportunity to be contacted on a monthly or quarterly basis for account updates and reviews. All clients are encouraged to have more formal annual reviews.

Client Referrals and Other Compensation

JAIM does not receive any compensation from any entity for client referrals or any other type of "other compensation."

Custody

Clients of JAIM should regularly review their statements from the qualified custodian where their assets are held. All clients receive either monthly or quarterly form the account custodian. JAIM is not a custodian for client's assets.

Investment Discretion

JAIM does not have discretionary authority over any accounts without verbal or written authorization.

Voting Client Securities

JAIM does not participate in voting client securities.

Financial Information

All financial disclosure information is N/A.

Members/Employees

John Arthur is the sole member of JA Investment Management, LLC. There are currently no employees.

Trading

There is currently no personal trading being conducted by John Arthur. JAIM does not participate or have any interest in client transactions and/or personal trading conflicts.

Complaints

An active complaint file is kept at the office address of record. All written complaints are kept indefinitely. If written complaints cannot be resolved between the advisor and client, clients are instructed on options they have to report complaints to regulatory authorities.

Marketing

Current marketing material is company letterhead, business card, Facebook page, social media ad, and website (www.jainvestment.com).

Continuity

In the event of advisor's death, or the dissolve of JAIM, all client accounts will continue to remain with the current custodian. JAIM would simply be removed as the adviser of record. It is encouraged for clients to seek professional help to further manage their accounts if this event were to occur.

Privacy Statement

It is our pledge and duty to protect the privacy of every client.

Personal Information Collected

All information collected by JA Investment Management, LLC is private.

Sharing of Information

Client's private information is not shared with any party.

Relationship with Custodian

Client account needs are addressed as needed by JA Investment Management, LLC and your account custodian. Private information is not discussed.

Security

All client information is kept securely on file at our Hurricane, WV office.

Client Rights

I. (Contact) Upon becoming a client you will receive a monthly or quarterly statement (depending on your account activity) from the custodian that holds your account. You will be contacted per your request for continuing reviews. We should have at least one face-to-face meeting annually or as your as your personal situation changes. Client contact is the backbone of my investment philosophy. Contact is essential to monitor overall performance, rebalance/restructure allocation, address questions and concerns, insure compliance, and evaluate goals.

II. (Costs) Management fees will begin being billed on a prorated basis at the time of deposit, and ongoing on a monthly/quarterly basis (depending on account type). Private management platforms are 1.5% for active management/contact and 1% for passive management/contact. These costs are clearly disclosed on your monthly/quarterly statement.

III. The three questions that should be answered before any investments are made are: What are the risks, liquidity, and costs associated with this investment? It is my job to be sure you understand all investments in which we are involved. It is your job to ask questions to be sure that you are comfortable with each investment, and regularly review your monthly/quarterly statement to insure accuracy.

IV. My business has been built through word-of-mouth. I primarily accept new business from individuals who have been sent to me through a client. My job is to service you, and not soliciting for new business.

V. My telephone is open anytime. Your phone call will be returned within 24 hours, starting with the time I receive your message. I expect the same in return from my clients.

VI. You have the right to competency, integrity, objective advice, fair treatment, privacy, professional conduct, and diligence

VII. You can discontinue our business relationship at anytime.

Requirements for State-Registered Advisers

John Arthur graduated from Marshall University in 1999. He received a Bachelor of Business Administration Degree in Finance. He also holds a Minor in Economics and Communications. While at Marshall he was the President of the Financial Management Association and was an intern for Merrill Lynch, Inc.

All other state required disclosure are N/A.