Item 1: Cover Page

The David J. Yvars Group, Inc.

Form ADV Part 2A

Investment Adviser Brochure

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February 4, 2026

This Brochure provides information about the qualifications and business practices of The David J. Yvars Group, Inc. ("we", "us", "our"). If you have any questions about the contents of this Brochure, please contact David J. Yvars, Sr., Chief Executive Officer, Senior Portfolio Manager and Chief Compliance Officer at (914) 741-9700 or david@yvarsgroup.com.

Additional information about our Firm is also available on the SEC's website at www.adviserinfo.sec.gov. 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.

We are a registered investment adviser. Please note that use of the term "registered investment advisor" and a description of the Firm and/or our employees as "registered" does not imply a certain level of skill or training. For more information on the qualifications of the Firm and our employees who advise you, we encourage you to review this Brochure and the Brochure Supplement(s).

Item 2: Summary of Material Changes

Annual Update

In this Item of The David J. Yvars Group, Inc.'s (DJY or the Firm) Form ADV 2, the Firm is required to discuss any material changes that have been made to Form ADV since the last Annual Amendment.

Material Changes since the Last Update

Since the last Annual Amendment filing, we have no material changes to report.

Full Brochure Available

DJY's Form ADV may be requested at any time, without charge by contacting David J. Yvars, Sr., Chief Executive Officer, Senior Portfolio Manager and Chief Compliance Officer at (914) 741-9700 or david@yvarsgroup.com.

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Item 4: Advisory Business

Firm Description and Types of Advisory Services

DJY is an investment adviser providing investment advisory services as well as financial planning services to individuals, high net worth individuals, pension and profit-sharing plans, trusts, estates and corporations. DJY was founded in 2004.

Principal Owners

DJY is owned by David J. Yvars, Sr., Chief Executive Officer, Senior Portfolio Manager and Chief Compliance Officer, and David J. Yvars, Jr., Chief Financial Officer.

Investment Advisory Services

DJY generally advises portfolios on a discretionary basis, although some portfolios may be non-discretionary. Through personal interviews, DJY gathers information about client assets, liabilities, investment goals, objectives and time horizon. DJY's creates customized, structured portfolios, tailored to each client's individual risk tolerance. Asset allocation mix may fluctuate and vary depending on DJY's recommendations and market conditions.

DJY may provide a detailed financial plan consistent with a client's financial status, investment objectives and constraints, risk tolerance and tax status. The financial plan may include the following areas of concern: personal, retirement, investments, tax and cash flow, and death and disability. The financial plan may also include generic recommendations as to general types of investment products or specific securities that may be appropriate for the client to purchase given his or her financial situation and objectives.

Financial Planning

DJY offers financial planning services to clients for which it provides Investment Advisory Services.

Financial planning services may include a review of all aspects of a client's current financial situation, including the following components: cash management, risk management, insurance, education funding, goal setting, retirement planning, estate and charitable giving planning, tax planning, and capital needs planning. DJY may meet with the client to review risk tolerance, financial goals and objectives, and time horizons and may prepare a written financial plan.

Financial planning services are based on the client's financial situation at the time and are based on financial information disclosed by the client to DJY. Certain assumptions may be made with respect to interest and inflation rates and use of past trends and performance of the market and economy. DJY does not offer any guarantees or promises that client's financial goals and objectives will be met. Clients should notify DJY promptly of any changes to the client's financial goals, objectives or financial situation as such changes may require a review of the plan and changes to recommendations.

Tailored Relationships

DJY tailors investment advisory services to the individual needs of the client. The goals and objectives for each client are documented in our client relationship management system. Client Profiles are created that reflect the stated goals and objective. DJY clients are allowed to impose restrictions on the investments in their account. DJY may accept any reasonable limitation or restriction to discretionary authority on the account placed by the client. All limitations and restrictions placed on accounts must be presented to DJY in writing.

Fiduciary Statement

DJY and its employees are fiduciaries who must take into consideration the best interests of our clients. DJY will act with competence, dignity, integrity, and in an ethical manner, when dealing with clients. DJY will use reasonable care and exercise independent professional judgement when conducting investment analysis, making investment recommendations, trading, promoting our services, and engaging in other professional activities.

As a fiduciary, DJY has the obligation to deal fairly with our clients. DJY has the following responsibilities when working with a client:

- To render impartial advice;
- To make appropriate recommendations based on the client's needs, financial circumstances and investment objectives;
- To exercise a high degree of care and diligence to ensure that information is presented in an accurate manner and not in a way to mislead;
- To have reasonable basis, information, and understanding of the facts in order to provide appropriate recommendations and representations;
- Disclose any material conflict of interest in writing; and
- Treat clients fairly and equitably.

Wrap Fee Programs

DJY does not participate in a Wrap Fee Program.

Client Assets

As of December 31, 2025, DJY managed approximately $359,326,254 in assets. Approximately $278,469,515 is managed on a discretionary basis, and approximately $80,856,739 is managed on a non-discretionary basis.

Item 5: Fees and Compensation

Compensation

DJY bases its fees on a percentage of assets under management. DJY's fee schedules are described below.

Compensation – Investment Advisory Services

For investment advisory services, the client will pay annualized advisory fees as follows.

Portfolio Value	Equity/Balanced	Fixed Income
First $500,000	3.00%	1.25%
Next $500,000	2.20%	1.10%
Next $4,000,000	1.60%	1.00%
Above $5,000,000	1.40%	0.80%

The advisory fee will be due and payable quarterly in advance based on the market value of the account assets including cash under management as of the close of business on the last business day of the preceding quarter. Clients also elect to be invoiced directly for fees or to authorize DJY to directly debit fees from client accounts. Upon termination of any account, any earned, unpaid fees will be due and payable. The advisory fee will be payable when the account is established, pro-rated for the first partial quarter.

Compensation – Financial Planning

DJY generally does not charge a separate fee for financial planning services.

Agreement Terms

A client may terminate the client agreement at any time by notifying DJY in writing and paying the rate for the time spent on the investment advisory engagement prior to notification of termination.

Cash Balances

Some of your assets may be held as cash and remain uninvested. Holding a portion of your assets in cash and cash alternatives, i.e., money market fund shares, may be based on your desire to have an allocation to cash as an asset class, to support a phased market entrance strategy, to facilitate transaction execution, to have available funds for withdrawal needs or to pay fees or to provide for asset protection during periods of volatile market conditions. Your cash and cash equivalents will be subject to our investment advisory fees unless otherwise agreed upon. You may experience negative performance on the cash portion of your portfolio if the investment advisory fees charged are higher than the returns you receive from your cash.

General Information on Compensation

In certain circumstances, fees, account minimums and payment terms are negotiable depending on client's unique situation – such as the size of the aggregate related party portfolio size, family

holdings, low-cost basis securities, or certain passively advised investments and pre-existing relationships with clients. Certain clients may pay more or less than others depending on the amount of assets, type of portfolio, or the time involved, the degree of responsibility assumed, complexity of the engagement, special skills needed to solve problems, the application of experience and knowledge of the client's situation. Lower fees for comparable services may be available from other sources.

DJY's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients will incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions.

Mutual funds and variable annuity sub-account fees and expenses are described in each fund's or sub account's prospectus. These fees will generally include a management fee, other expenses, and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge.

Such charges, fees and commissions are exclusive of and in addition to DJY's fee, and DJY shall not receive any portion of these commissions, fees, and costs.

Apart from the personal client service provided directly by DJY, services identical to DJY's may be provided by other investment advisers for advisory fees that may be greater than or less than the advisory fees charged by DJY.

Compensation for the Sale of Securities or Other Investment Products

David J. Yvars, Sr., CEO and Chief Compliance Officer, is a licensed insurance agent. To the extent that Mr. Yvars receives commission-based compensation from his capacity as an insurance agent, such compensation presents a conflict of interest because Mr. Yvars has a financial incentive to sell insurance products to you. Clients are under no obligation, contractually or otherwise, to purchase insurance products through Mr. Yvars. As a fiduciary, it is our firm's obligation to always act in our client's best interest.

Item 6: Performance-Based Fees and Side-by-Side Management

Neither DJY nor any of its Supervised Persons (employees) accepts performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).
DJY 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.

Item 7: Types of Clients

Types of Clients

As described in Item 4, DJY's clients include individuals, high net worth individuals, pension and profit-sharing plans, trusts, estates, corporations and defined contribution plans.

Account Minimums

The minimum portfolio size is $500,000 for investment advisory clients, although this may be negotiable under certain circumstances. Waivers or exceptions may be granted at the exclusive discretion of DJY. DJY may group certain related client accounts for the purposes of achieving the minimum account size.

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

Methods of Analysis

DJY may employ the following security analysis methods: Fundamental analysis; charting /technical analysis; and cyclical analysis.

Fundamental Analysis. DJY attempts to measure the intrinsic value of a security by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management of the company itself) to determine if the company is underpriced (indicating it may be a good time to buy) or overpriced (indicating it may be time to sell).

Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.

Charting/Technical Analysis. The terms "charting" and "technical" analysis are generally used synonymously and therefore, for the purpose of this document, the term, "technical analysis" will be used. DJY analyzes past market movements and applies that analysis to the present in an attempt to recognize recurring patterns of investor behavior and potentially predict future price movement.

Technical analysis does not consider the underlying financial condition of a company.

Cyclical Analysis. In this type of technical analysis, DJY measures the movements of a particular stock against the overall market in an attempt to predict the price movement of the security.

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 Client Profile that documents their objectives and their desired investment strategy.

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.

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. Although we manage assets in a manner consistent with your investment

objectives and risk tolerance, there can be no guarantee that our efforts will be successful. You should be prepared to bear the following risk of loss:

- **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 next year will not buy as much as a dollar today, 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.
- **Cybersecurity Risk:** A breach in cyber security refers to both intentional and unintentional events that may cause an account to lose proprietary information, suffer data corruption, or lose operational capacity. This in turn could cause an account to incur regulatory penalties, reputational damage, and additional compliance costs associated with corrective measures, and/or financial loss.
- **Pandemic Risk**: Large-scale outbreaks of infectious disease can greatly increase morbidity and mortality over a wide geographic area, crossing international boundaries, and causing significant economic, social, and political disruption.

DJY reserves the right to advise clients on any other type of investment that it deems appropriate based on the client's stated goals and objectives. DJY may also provide advice on any type of

investment held in a client's portfolio at the inception of the advisory relationship or on any investment on which the client requests advice.

Item 9: Disciplinary Information

On November 14, 2022, the Office of Financial Regulation (Office) entered a Final Order adopting a Stipulation and Consent Agreement in the matter of David James Yvars. Mr. Yvars neither admitted nor denied the allegations, but consented to the entry of findings by the Office. The Office found that Mr. Yvars violated Section 517.12(4) Florida Statutes by rendering investment advice from a location within Florida without being registered by the Office. Although Mr. Yvars relied on advice from his former third-party compliance consulting firm that assured he and the firm were compliant with applicable federal and state rules and regulations at all times, Mr. Yvars agreed to Cease and Desist from violations of Chapter 517, Florida Statutes, and the Administrative Rules adopted thereto, and to pay an administrative fine in the amount of $10,000. The Office agreed to approve Mr. Yvars' application as an associated person (Investment Adviser Representative) with The David J. Yvars Group, Inc. effective November 14, 2022, and Mr. Yvars since has reached a settlement agreement with his former compliance firm to reimburse all fines and expenses.

Item 10: Other Financial Industry Activities and Affiliations

Financial Industry Activities and Affiliations

DJY is not registered as a broker-dealer, and none of its management persons are registered representatives of a broker-dealer.

Neither DJY nor any of its management persons is registered as (or associated with) a futures commissions merchant, commodity pool operator, or a commodity trading advisor.

Other Affiliations – Insurance Agent

David J. Yvars, Sr., CEO and Chief Compliance Officer, is a licensed insurance agent. To the extent that Mr. Yvars receives commission-based compensation from his capacity as an insurance agent, such compensation presents a conflict of interest because Mr. Yvars has a financial incentive to sell insurance products to you. Clients are under no obligation, contractually or otherwise, to purchase insurance products through Mr. Yvars. As a fiduciary, it is our firm's obligation to always act in our client's best interest.

Other Investment Advisors

DJY may recommend or select other investment advisors for its clients. DJY does not receive any compensation for the selection of other managers.

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

Code of Ethics

DJY employees must comply with a Code of Ethics and Statement for Insider Trading. The Code describes the Firms' high standard of business conduct, and fiduciary duty to its clients. The Code's key provisions include:

- Statement of General Principles
- Policy on and reporting of Personal Securities Transactions
- A prohibition on Insider Trading
- Restrictions on the acceptance of significant gifts
- Procedures to detect and deter misconduct and violations
- Requirement to maintain confidentiality of client information

David J. Yvars, Sr., Chief Executive Officer, Senior Portfolio Manager and Chief Compliance Officer, reviews all employee trades each quarter. His trades are reviewed by David J. Yvars, Jr., Chief Financial Officer. These reviews ensure that personal trading does not affect the markets, and that clients of DJY receive preferential treatment.

DJY's employees must acknowledge the terms of the Code of Ethics at least annually. Any individual not in compliance with the Code of Ethics may be subject to termination.

Clients and prospective clients can obtain a copy of DJY's Code of Ethics by contacting David J. Yvars, Sr., Chief Executive Officer, Senior Portfolio Manager and Chief Compliance Officer at (914) 741-9700.

Participation or Interest in Client Transactions – Financial Interest and Principal/Agency Cross

It is DJY's policy that the Firm will not affect any principal or agency cross securities transactions for client accounts. DJY will also not cross trades between client accounts.

DJY and its employees do buy or sell securities identical to those recommended to clients for their personal accounts, both on an aggregated (as noted below) or unaggregated basis. The Code of Ethics, described above, is designed to assure that the personal securities transactions, activities and interests of the employees of DJY will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities, primarily mutual funds, have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of DJY's clients. In addition, the Code requires pre-clearance of many transactions. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a

security held by an employee. Employee trading is continually monitored under the Code of Ethics and designed to reasonably prevent conflicts of interest between DJY and its clients

Participation or Interest in Client Transactions – Aggregation

DJY and its employees do buy or sell the same securities in their personal accounts, on both an aggregated and unaggregated basis, that are recommended to clients. In circumstances involving aggregated orders, the affiliated and client accounts will share commission costs equally and receive securities at a total average price. DJY will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained on the order.

Item 12: Brokerage Practices

Research and Other Soft Dollar Benefits

DJY does not receive formal soft dollar benefits other than execution from broker/dealers in connection with client securities transactions. See disclosure below in "Directed Brokerage – Other Economic Benefits."

Brokerage for Client Referrals

DJY does not receive client referrals from broker/dealers.

Directed Brokerage

Clients are free to select any broker they wish and are so informed. DJY generally recommends Raymond James Financial Services (RJFS); however, the client will ultimately be responsible for selection of the financial institution. The primary factors considered in DJY's decision to recommend RJFS include financial strength and the quality of the products and services it offers to clients. Specific products and services include quality execution services, consolidated reporting of all assets and Internet access to client portfolios. Additionally, DJY receives client information electronically in order to facilitate its review of client portfolios.

When a client selects RJFS, commission rates will be the lowest rate available to DJY based on its volume of activity with RJFS; however, commissions may be charged which are higher or lower than commission rates at these firms or other broker/dealers. DJY monitors RJFS's best execution policies on a regular basis to ensure clients continue to receive high quality executions. DJY and its principals and advisor representatives do not share in any of the commissions, transaction fees or service fees that may be received by RJFS.

A client may select a broker other than RJFS if, for example, the client will be receiving investment advisory consulting services from such Specified Broker. The client may direct DJY to affect all transactions for the client's portfolio through a Specified Broker; DJY does not negotiate brokerage commissions with respect to transactions executed by the Specified Broker for the client's portfolio.

The client and the Specified Broker agree on the commission rate that the Specified Broker will charge for transactions effected for the amount. As a result, and depending upon:

1. The client's arrangement with the Specified Broker,
2. Such factors as the number of securities, instruments or obligations being bought or sold for the client, whether round or odd lots are being acquired for the client and the market for the security, instrument or obligation, and
3. The fact that the client will be foregoing any benefit from savings on execution costs that DJY could obtain for its clients through negotiating volume commission discounts on batched transactions.

The client may pay higher commissions than those paid by DJY's clients who have not directed DJY to execute transactions through a specified broker or dealer.

In addition, the client may not receive the lowest available price with respect to certain transactions effected for the client's portfolio. In its investment advisory agreements with clients who have directed DJY to execute transactions through a Specified Broker, DJY generally requires the client to acknowledge the potential for such conflicts of interest. With full disclosure, DJY believes that no conflict of interest that is detrimental to the client will result, since through full disclosure, the clients will have the opportunity to determine what is in their best interests.

The commissions paid by DJY's clients when DJY selects the broker, shall comply with DJY's duty to seek "best execution." However, a client may pay a commission that is higher than another qualified broker-dealer might charge to affect the same transaction where DJY determines, in good faith, that the commission is reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including among others, the value of research provided, execution capability, commission rates, and responsiveness. Consistent with the foregoing, while DJY will seek competitive rates, it may not necessarily obtain the lowest possible commission rates for client transactions.

Directed Brokerage – Other Economic Benefits

DJY clients use RJFS for all or substantially all of their brokerage transactions. In addition to brokerage services, RJFS provides DJY's clients with valuable custodial, and recordkeeping. DJY receives traditional "non-cash benefits" from RJFS, such as customized statements; receipt of duplicate client confirmations and bundled duplicate statements; access to a trading desk servicing RJFS Advisors exclusively; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to client portfolios; ability to have investment advisory fees deducted directly from client portfolios; access to an electronic communication network for client order entry and portfolio information; access to mutual funds which generally require significantly high minimum initial investments or those that are otherwise only generally available to institutional investors; reporting features; receipt of industry communications; and perhaps discounts on business-related products. RJFS also provides general access to research and perhaps discounts on research products. Any research received is used for the benefit of all clients.

Periodically, DJY reviews its brokerage relationship with RJFS to ensure that it is fulfilling its fiduciary duty to seek best execution on client transactions. Since DJY provides asset allocation services to advisory clients, the rebalancing of clients' investment portfolios occurs on a regular basis. Because of such rebalancing, DJY clients may execute odd lot transactions, which could generate higher transaction fees.

While DJY endeavors at all times to put the interest of the clients first as part of its fiduciary duty, clients should be aware that the receipt of any additional compensation itself creates a conflict of interest and may affect the judgment of these individuals when making recommendations.

Client Directed Brokerage

While DJY may at times recommend brokers, the client may direct DJY in writing to use a particular broker or dealer to execute transactions for the client's portfolio, of which the client will negotiate terms and arrangements with that broker or dealer. DJY will not seek better execution services or prices from other brokers or dealers and as a result, client could pay higher commissions, other transaction costs, greater spreads, or receive less favorable net prices on transactions for the client's portfolio than would otherwise be the case.

Trade Aggregation

DJY typically aggregates trades for multiple accounts. Orders for the same security entered on behalf of more than one client will generally be aggregated (i.e., blocked or bunched) subject to the aggregation being in the best interests of all participating clients. If the order is filled at different prices during the day, the prices are averaged for the day so that all participating accounts receive the same price. If an order has not been filled completely so that there are not enough shares to allocate among all the clients equally, shares will be allocated in good faith, based on the following considerations: amount of cash in the account, existing asset allocation and industry exposure, risk profile, and type of security. All clients participating in each aggregated order shall receive the average price and subject to minimum ticket charges, pay a pro-rata portion of commissions.

DJY's allocation procedure seeks to be fair and equitable to all clients with no particular group or client(s) being favored or disfavored over any other clients.

Accounts for DJY employees are included in block trade transactions (aggregated orders) with client accounts.

Item 13: Review of Accounts

Reviews

The day-to-day supervision of the portfolios is the responsibility of David J. Yvars, Sr., Chief Executive Officer, Senior Portfolio Manager and Chief Compliance Officer. Investment portfolios are continuously reviewed and monitored. Factors that may trigger more frequent reviews include material market events or changes in a client's personal situation. In addition, each client portfolio is reviewed periodically for compliance with the investment policies, suitability of investments and client investment objectives. David J. Yvars, Sr. is responsible for overseeing all reviews.

Review Triggers

Other conditions that may trigger a review are changes in market, political or economic conditions, tax laws, new investment information, and changes in a client's own situation.

Reporting

Clients receive monthly statements and periodic confirmations from their broker/dealers, mutual fund companies and/or custodians, as applicable.

Financial Planning

Financial Planning clients will be reviewed as contracted for at the inception of the engagement. Financial Planning clients receive reports as contracted for at the inception of the engagement.

Item 14: Client Referrals and Other Compensation

Other Compensation

DJY does not receive any formal economic benefits (other than normal compensation and benefits described in Item 12) from any firm or individual for providing investment advice.

Compensation – Economic Benefits

As disclosed in Item 12, DJY requires clients to establish brokerage accounts with RJFS, a FINRA-registered broker-dealer, member SIPC, to maintain custody of clients' assets and to effect trades for their accounts. Although DJY may recommend/require that clients establish accounts at RJFS, it is the client's decision to custody assets with DJY. DJY is independently owned and operated and not affiliated with RJFS.

Other Compensation – Brokerage Arrangements

See disclosure in Item 12 regarding compensation, including economic benefits received in connection with giving advice to clients.

Compensation – Client Referrals – Solicitation Arrangement

DJY enters into written arrangements to pay cash referral fees to individuals or companies (Solicitors) who recommend prospective clients to DJY. In these cases, there will be a written agreement between DJY and the Solicitor, which clearly defines the duties and responsibilities of the solicitor under this arrangement. In addition, each Solicitor is required to provide a written disclosure document, which explains to the prospective client the terms under which the Solicitor is working with DJY and the fact that the Solicitor is being compensated for the referral activities. The Solicitor is also required to furnish a copy of DJY's written disclosure document to the prospective client and obtain a written acknowledgement from the client that both the Solicitor's and DJY's disclosure documents have been received.

One of DJY's Solicitors is an accounting firm that provides accounting and tax services for DJY and David J. Yvars, Sr. The Solicitor is compensated at the same rate as other Solicitors, and all clients obtained through this arrangement have been provided all relevant disclosures. In addition, all accounting and tax services are provided to DJY and David J. Yvars, Sr. at the accounting firm's customary rates.

Item 15: Custody

Custody – Fee Debiting

DJY has one form of custody. Clients may authorize DJY (in the client agreement) to debit fees directly from the client's account at the broker dealer, bank or other qualified custodian (custodian). Client investment assets will be held with a custodian agreed upon by the client and DJY. The custodian is advised in writing of the limitation of DJY's access to the account. The custodian sends a statement to the client, at least quarterly, indicating all amounts disbursed from the account including the amount of advisory fees paid directly to DJY.

Custody – First Party Money Transfers

Clients may provide DJY with written ongoing authorization to wire money between the client's accounts held with the qualified custodian directly to an outside financial institution (i.e., a client's bank account). A copy of this authorization is provided to the qualified custodian. The authorization includes the client's name and account number(s) at the outside financial institution(s) as required.

Custody – Account Statements

As described above and in Item 13, clients receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. Clients are urged to carefully review such statements and compare such official custodial records to the account statements or other reports that DJY provides. DJY statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16: Investment Discretion

Through the investment management agreement, DJY may accept limited power of attorney to act on a discretionary basis on behalf of clients. A limited power of attorney allows DJY to execute trades on behalf of clients.

When such limited powers exist between the DJY and the client, DJY has the authority to determine, without obtaining specific client consent, both the amount and type of securities to be bought to satisfy client account objectives. Additionally, DJY may accept any reasonable limitation or restriction to such authority on the account placed by the client. All limitations and restrictions placed on accounts must be presented to DJY in writing.

However, DJY 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

DJY does not vote proxies on behalf of clients. Clients retain the responsibility for receiving and voting proxies for securities maintained in their portfolios and will receive proxies directly from either custodians or transfer agents. DJY does not render advice to or take any actions on behalf of clients with respect to any legal proceedings, including bankruptcies and shareholder litigation.

Item 18: Financial Information

DJY has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy proceeding.

DJY is not required to provide a balance sheet; DJY does not require prepayment of fees of more than $1,200 per client, and six months or more in advance.