



Yarborough  
Asset  
Management  
Strategies

Where economic empowerment matters

## Firm Brochure - Form ADV Part 2A

*This brochure provides information about the qualifications and business practices of YAMS, LLC. If you have any questions about the contents of this brochure, please contact us at (919) 600-8922 or by email at: [info@yamsllc.com](mailto:info@yamsllc.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 YAMS, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). YAMS, LLC's CRD number is: 290137.*

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*Registration does not imply a certain level of skill or training.*

Version Date: 04/27/2021

## Item 2: Material Changes

The material changes for Form ADV Part2A are listed below.

- **ITEM 4 SECTION B:** ADDED LANGUAGE TO FINANCIAL PLANNING AND PORTFOLIO MANAGEMENT SERVICES
- **ITEM 4 SECTION B:** ADDED LANGUAGE TO REFLECT EDUCATIONAL WORKSHOPS AND SPEAKING ENGAGEMENTS AS SERVICE
- **ITEM 5 SECTION A:** ADDED LANGUAGE TO REFLECT FEE COMPENSATION FOR EDUCATIONAL SEMINARS/WORKSHOPS AND SPEAKING ENGAGEMENTS
- **ITEM 5 SECTION A:** CHANGED HOURLY RATE FROM \$200-\$1,000 TO \$250-\$1,000
- **ITEM 5 SECTION B:** ADDED MONTHLY ON-GOING FEE FOR FINANCIAL PLANNING
- **ITEM 5 SECTION B:** ADDED CHECK, WIRE, CREDIT CARD AND ACH TRANSFER AS FORMS OF PAYMENT
  
- **ITEM 12 SECTION A:** ADDED LANGUAGE REGARDING TDAMERITRADE
- **ITEM 16:** REMOVED NON-DISCRETIONARY AS FIRM ONLY OFFERS DISCRETIONARY INVESTMENT MANAGEMENT

### NON-MATERIAL CHANGES

- UPDATED EMAIL ADDRESS TO RELECT INFO@YAMSLLC.COM
- ADDED YARBOROUGH ASSET MANAGEMENT STRATEGIES TO TITLE PAGE
- ADDED LOGO TO TITLE PAGE
- CHANGED LOGO on TITLE PAGE

## Item 3: Table of Contents

|  |     |
|--|-----|
| Item 1: Cover Page   |     |
| Item 2: Material Changes.....  | ii  |
| Item 3: Table of Contents.....   | iii |
| Item 4: Advisory Business.....   | 2   |
| A. Description of the Advisory Firm.....   | 2   |
| B. Types of Advisory Services.....   | 2   |
| C. Client Tailored Services and Client Imposed Restrictions.....   | 4   |
| D. Wrap Fee Programs.....  | 4   |
| E. Assets Under Management.....  | 4   |
| Item 5: Fees and Compensation.....   | 4   |
| A. Fee Schedule.....   | 4   |
| B. Payment of Fees.....  | 6   |
| C. Client Responsibility For Third Party Fees.....   | 7   |
| D. Prepayment of Fees.....   | 7   |
| E. Outside Compensation For the Sale of Securities to Clients.....   | 7   |
| Item 6: Performance-Based Fees and Side-By-Side Management.....  | 7   |
| Item 7: Types of Clients.....  | 8   |
| Item 8: Methods of Analysis, Investment Strategies, & Risk of Loss.....  | 8   |
| A. Methods of Analysis and Investment Strategies.....  | 8   |
| B. Material Risks Involved.....  | 9   |
| C. Risks of Specific Securities Utilized.....  | 9   |
| Item 9: Disciplinary Information.....  | 11  |
| A. Criminal or Civil Actions.....  | 11  |
| B. Administrative Proceedings.....   | 11  |
| C. Self-regulatory Organization (SRO) Proceedings.....   | 11  |
| Item 10: Other Financial Industry Activities and Affiliations.....   | 11  |
| A. Registration as a Broker/Dealer or Broker/Dealer Representative.....  | 11  |
| B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor..... | 11  |
| C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests.....      | 11  |
| D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections.....       | 12  |
| Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....            | 12  |
| A. Code of Ethics.....   | 12  |
| B. Recommendations Involving Material Financial Interests.....   | 12  |
| C. Investing Personal Money in the Same Securities as Clients.....   | 12  |

|          |  |    |
|----------|--|----|
| D.       | Trading Securities At/ Around the Same Time as Clients' Securities .....   | 12 |
| Item 12: | Brokerage Practices.....   | 13 |
| A.       | Factors Used to Select Custodians and/or Broker/Dealers .....  | 13 |
| 1.       | Research and Other Soft-Dollar Benefits.....   | 13 |
| 2.       | Brokerage for Client Referrals.....  | 13 |
| 3.       | Clients Directing Which Broker/Dealer/Custodian to Use .....   | 14 |
| B.       | Aggregating (Block) Trading for Multiple Client Accounts.....  | 14 |
| Item 13: | Review of Accounts.....  | 14 |
| A.       | Frequency and Nature of Periodic Reviews and Who Makes Those Reviews.....  | 14 |
| B.       | Factors That Will Trigger a Non-Periodic Review of Client Accounts.....  | 14 |
| C.       | Content and Frequency of Regular Reports Provided to Clients.....  | 15 |
| Item 14: | Client Referrals and Other Compensation.....   | 15 |
| A.       | Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes) ..... | 15 |
| B.       | Compensation to Non - Advisory Personnel for Client Referrals .....  | 15 |
| Item 15: | Custody .....  | 15 |
| Item 16: | Investment Discretion .....  | 15 |
| Item 17: | Voting Client Securities (Proxy Voting).....   | 16 |
| Item 18: | Financial Information.....   | 16 |
| A.       | Balance Sheet.....   | 16 |
| B.       | Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients .....                | 16 |
| C.       | Bankruptcy Petitions in Previous Ten Years .....   | 16 |
| Item 19: | Requirements For State Registered Advisers.....  | 16 |
| A.       | Principal Executive Officers and Management Persons; Their Formal Education and Business Background .....                | 16 |
| B.       | Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any) .....         | 16 |
| C.       | Calculation of Performance-Based Fees and Degree of Risk to Clients .....  | 17 |
| D.       | Material Disciplinary Disclosures for Management Persons of this Firm .....  | 17 |
| E.       | Material Relationships That Management Persons Have With Issuers of Securities (If Any) .....                            | 17 |

## Item 4: Advisory Business

### A. Description of the Advisory Firm

YAMS, LLC (hereinafter “YAMS”) is a Limited Liability Company organized in the State of North Carolina. The firm was formed in August 2017, and the principal owner is Lenoris Yarborough, Jr (a.k.a. LJ Yarborough).

### B. Types of Advisory Services

#### *Portfolio Management Services*

YAMS offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. YAMS typically, but is not obligated to, create an Investment Policy Statement for each client, which outlines the client’s current situation (income, tax levels, and risk tolerance levels). Portfolio management services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

YAMS evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. YAMS will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, or other profile form.

YAMS seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of YAMS’s economic, investment or other financial interests. To meet its fiduciary obligations, YAMS attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, YAMS’s policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is YAMS’s policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent among its clients on a fair and equitable basis over time.

Termination of the Investment Advisory Contract by either party shall result in a minimum twelve-month separation in business between the Client and YAMS from the date of termination. Execution of a new Investment Advisory Contract between the Client and YAMS prior to the twelve-month separation period will be at the discretion of YAMS.

## ***Financial Planning***

The most commonly used model among our clients involves working one-on-one with a planner over an extended period of time. By paying a monthly subscription, clients receive ongoing access to a planner who will work with them to design their plan. The planner will monitor the plan, recommend any changes and ensure the plan is up to date on a periodic basis.

Upon desiring a comprehensive plan, a client will be taken through establishing their goals and values around money. They will be required to provide information to help complete the following areas of analysis: net worth, cash flow, insurance, credit scores/reports, employee benefit, retirement planning, insurance, investments, college planning and estate planning.

Their plan will be built and analyzed by LJ Yarborough and then the findings, analysis and potential changes will be reviewed with the client. If a follow up meeting is required, the client and LJ Yarborough will meet at the client's convenience. The plan will be monitored throughout the year and follow-up phone and/or video calls and emails will be made to the client to confirm that any agreed upon action steps have been carried out. On an annual basis there will be a full review of this plan to ensure its accuracy. Any needed updates will be implemented at that time.

Financial plans and financial planning may include, but are not limited to, investment planning; life insurance; tax concerns; retirement planning; college planning; and debt/credit planning.

Termination of the Financial Planning Agreement by either party shall result in a minimum twelve-month separation in business between the Client and YAMS from the date of termination. Execution of a new Financial Planning Agreement between the Client and YAMS prior to the twelve-month separation period will be at the discretion of YAMS.

## ***Services Limited to Specific Types of Investments***

YAMS generally limits its investment advice to mutual funds, fixed income securities, equities, ETFs (including ETFs in the gold and precious metal sectors), treasury inflation protected/inflation linked bonds, commodities and non-U.S. securities, although YAMS primarily recommends equities. YAMS may use other securities as well to help diversify a portfolio when applicable.

## ***Educational Seminars and Speaking Engagements***

YAMS may provide seminars on an "as announced" basis for groups seeking general advice on investments and other areas of personal finance. The content of these seminars will vary depending upon the needs of the attendees. These seminars are purely educational in nature and do not involve the sale of any investment products. Information

presented will not be based on any individual's person's need, nor does YAMS provide individualized investment advice to attendees during these seminars.

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

YAMS offers the same suite of services to all of its clients. However, specific client investment strategies and their implementation are dependent upon the client Investment Policy Statement or profile form which outlines each client's current situation (income, tax levels, and risk tolerance levels). Clients may not impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs.

### **D. Wrap Fee Programs**

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and other administrative fees. YAMS does not participate in any wrap fee programs.

### **E. Assets Under Management**

YAMS has the following assets under management:

| <b>Discretionary Amounts:</b> | <b>Non-discretionary Amounts:</b> | <b>Date Calculated:</b> |
|-------------------------------|-----------------------------------|-------------------------|
| \$75,082                      | \$0                               | Dec 2020                |

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

### **A. Fee Schedule**

#### *Portfolio Management Fees*

| <b>Total Assets Under Management</b> | <b>Annual Fees</b> |
|--------------------------------------|--------------------|
| \$0 - \$499,999                      | 1.50%              |
| \$500,000 - \$999,999                | 1.25%              |
| \$1,000,000 - and up                 | 1.00%              |

The advisory fee is calculated using the value of the assets in the Account on the last business day of the prior billing period.

These fees are generally negotiable and the final fee schedule is attached as Exhibit II of the Investment Advisory Contract. Clients may terminate the agreement without penalty for a full refund of YAMS's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract generally with 30 days' written notice.

### ***Financial Planning Fees***

#### **Comprehensive Financial Planning**

The negotiated comprehensive financial planning fee is between \$2,000 and \$10,000.

#### **Fixed Fees**

The negotiated fixed rate for creating client financial plans is between \$2,000 and \$10,000.

#### **Hourly Fees**

The negotiated hourly fee for these services is between \$250 and \$1,000.

Clients may terminate the agreement without penalty, for full refund of YAM's fees, within five business days of signing the Financial Planning Agreement. Thereafter, clients may terminate the Financial Planning Agreement generally upon written notice.

#### **Educational Seminars/Workshops**

Seminars/workshops are offered to organizations and the public on a variety of financial topics. Fees range from free to \$\_\_2,000\_\_ per seminar or free to \$\_100\_ per participant. Fees are due prior to the engagement. The fee range is based on the content, amount of research conducted, number of hours of preparation needed, and the number of attendees. In the event of inclement weather or a flight cancellation, the Speaker shall make all reasonable attempts to make alternative travel arrangements to arrive in time for the presentation. If travel proves impossible, or the event is otherwise cancelled, the Speaker's fee is waived, but the Client will still be responsible for reimbursement of any non-refundable travel expenses already incurred.

In the event that the Client decides to cancel or change the date of the event for any reason besides weather or similar unforeseen causes, the Client will still be responsible for reimbursement of any non-refundable travel expenses already incurred, and will provide payment for \_50\_ % of the Speaker's fee if the cancellation occurs within 30 days of the event. In the event that the Speaker must cancel due to health or similar unforeseen circumstances, the Speaker will make all attempts to find a reasonable alternative engagement date and will absorb any incremental additional costs for obtaining alternative travel arrangements. If an alternative date cannot be obtained, the Client will not be responsible for any travel costs already incurred by the Speaker or any portion of the Speaker's fee.



## Speaking Engagements

LJ Yarborough is a public speaker. Generally, fees for his speaking engagements range from free to \$2,000 plus travel expenses, depending on sponsor, date, location, and program requested. For all speeches, 50% of the balance is due before the event and the remaining balance due at the conclusion of the event. The fee range is based on the content, amount of research conducted, number of hours of preparation needed, and the number of attendees. The content is based on topics that are currently relevant in the financial planning and investment management environment.

In the event of inclement weather or a flight cancellation, the Speaker shall make all reasonable attempts to make alternative travel arrangements to arrive in time for the presentation. If travel proves impossible, or the event is otherwise cancelled, the Speaker's fee is waived, but the Client will still be responsible for reimbursement of any non-refundable travel expenses already incurred. In the event that the Client decides to cancel or change the date of the event for any reason besides weather or similar unforeseen causes, the Client will still be responsible for reimbursement of any non-refundable travel expenses already incurred, and will provide payment for 50% of the Speaker's fee if the cancellation occurs within 30 days of the event. In the event that the Speaker must cancel due to health or similar unforeseen circumstances, the Speaker will make all attempts to find a reasonable alternative engagement date and will absorb any incremental additional costs for obtaining alternative travel arrangements. If an alternative date cannot be obtained, the Client will not be responsible for any travel costs already incurred by the Speaker or any portion of the Speaker's fee.

Educational Seminars and Speaking Engagements may be provided pro-bono at YAMS's discretion.

### **B. Payment of Fees**

#### *Payment of Portfolio Management Fees*

Asset-based portfolio management fees are withdrawn directly from the client's accounts with client's written authorization on a quarterly basis, or may be invoiced and billed directly to the client on a quarterly basis. Clients may select the method in which they are billed. Fees are paid in advance.

#### *Payment of Financial Planning Fees*

Financial planning fees are paid via check, wire, credit card, or ACH transfer.

Comprehensive Financial Planning consists of a one-time set-up fee of \$250 and an ongoing fee that is paid monthly, in advance, at the rate of \$145 and \$810 per month, depending on complexity and needs of the client. The fee may be negotiable in certain cases. Due to the level of work conducted at the beginning of this service, a 12-month

commitment is required. Once the service enters its thirteenth month, this service may be terminated with 15 days' notice. Upon termination, the fee will be prorated and any unearned fee will be refunded to the client.

Fixed financial planning fees are paid 25% in advance, but never more than six months in advance, with the remainder due upon presentation of the plan.

Hourly financial planning fees are paid 50% in advance, but never more than six months in advance, with the remainder due upon presentation of the plan.

### **C. Client Responsibility For Third Party Fees**

Clients are responsible for the payment of all third-party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by YAMS. Please see Item 12 of this brochure regarding broker-dealer/custodian.

### **D. Prepayment of Fees**

YAMS collects fees in advance. Refunds for fees paid in advance will be returned within fourteen days to the client via check or return deposit back into the client's account.

For all asset-based fees paid in advance, the fee refunded will be equal to the balance of the fees collected in advance minus the daily rate\* times the number of days elapsed in the billing period up to and including the day of termination. (\*The daily rate is calculated by dividing the annual asset-based fee rate by 365.)

Fixed fees that are collected in advance will be refunded based on the prorated amount of work completed at the point of termination.

For hourly fees that are collected in advance, the fee refunded will be the balance of the fees collected in advance minus the hourly rate times the number of hours of work that has been completed up to and including the day of termination.

### **E. Outside Compensation For the Sale of Securities to Clients**

Neither YAMS nor its supervised persons accept any compensation for the sale of investment products, including asset-based sales charges or service fees from the sale of mutual funds.

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

YAMS does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

## Item 7: Types of Clients

YAMS generally provides advisory services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals
- ❖ Charitable Organizations

There is no account minimum for any of YAMS's services.

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

### A. Methods of Analysis and Investment Strategies

#### *Methods of Analysis*

YAMS's methods of analysis include Charting analysis, Cyclical analysis, Fundamental analysis and Technical analysis.

**Charting analysis** involves the use of patterns in performance charts. YAMS uses this technique to search for patterns used to help predict favorable conditions for buying and/or selling a security.

**Cyclical analysis** involves the analysis of business cycles to find favorable conditions for buying and/or selling a security.

**Fundamental analysis** involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

**Technical analysis** involves the analysis of past market data; primarily price and volume.

#### *Investment Strategies*

YAMS uses long term trading and short-term trading.

YAMS may recommend unusually risky investments to clients. For example: At times, YAMS, LLC may recommend risky investments such as leveraged ETF's, inverse ETF's, volatility ETF's, and ETF's that trade options, futures, currencies and commodities.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## **B. Material Risks Involved**

### *Methods of Analysis*

**Charting analysis** strategy involves using and comparing various charts to predict long and short-term performance or market trends. The risk involved in using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. This may not be the case.

**Cyclical analysis** assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are two-fold: 1) the markets do not always repeat cyclical patterns; and 2) if too many investors begin to implement this strategy, then it changes the very cycles these investors are trying to exploit.

**Fundamental analysis** concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

**Technical analysis** attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not take into account new patterns that emerge over time.

### *Investment Strategies*

**Long term trading** is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

**Short term trading** risks include liquidity, economic stability, and inflation, in addition to the long-term trading risks listed above. Frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## **C. Risks of Specific Securities Utilized**

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency.

**Mutual Funds:** Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond “fixed income” nature (lower risk) or stock “equity” nature.

**Equity** investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

**Fixed income** investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best-known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

**Exchange Traded Funds (ETFs):** An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed “electronic shares” not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors.

**Commodities** are tangible assets used to manufacture and produce goods or services. Commodity prices are affected by different risk factors, such as disease, storage capacity, supply, demand, delivery constraints and weather. Because of those risk factors, even a well-diversified investment in commodities can be uncertain.

**Non-U.S.** securities present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

**Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## **Item 9: Disciplinary Information**

### **A. Criminal or Civil Actions**

There are no criminal or civil actions to report.

### **B. Administrative Proceedings**

There are no administrative proceedings to report.

### **C. Self-regulatory Organization (SRO) Proceedings**

There are no self-regulatory organization proceedings to report.

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

### **A. Registration as a Broker/Dealer or Broker/Dealer Representative**

Neither YAMS nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

### **B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor**

Neither YAMS nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

### **C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests**

Neither YAMS nor its representatives have any material relationships to this advisory business that would present a possible conflict of interest.

## **D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections**

YAMS does not utilize nor select third-party investment advisers. All assets are managed by YAMS management.

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

### **A. Code of Ethics**

YAMS has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. YAMS's Code of Ethics is available free upon request to any client or prospective client.

### **B. Recommendations Involving Material Financial Interests**

YAMS does not recommend that clients buy or sell any security in which a related person to YAMS or YAMS has a material financial interest.

### **C. Investing Personal Money in the Same Securities as Clients**

From time to time, representatives of YAMS may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of YAMS to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. YAMS will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

### **D. Trading Securities At/Around the Same Time as Clients' Securities**

From time to time, representatives of YAMS may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of YAMS to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, YAMS will never engage in

trading that operates to the client's disadvantage if representatives of YAM buy or sell securities at or around the same time as clients.

## **Item 12: Brokerage Practices**

### **A. Factors Used to Select Custodians and/or Broker/Dealers**

Custodians/broker-dealers will be recommended based on YAMS's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and YAMS may also consider the market expertise and research access provided by the broker-dealer/custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in YAMS's research efforts. YAMS will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

YAMS recommends TD Ameritrade, Inc. YAMS participates in the TD Ameritrade Institutional program. TD Ameritrade Institutional is a division of TD Ameritrade, Inc. ("TD Ameritrade"), member FINRA/SIPC. TD Ameritrade is an independent SEC-registered broker-dealer.

#### ***1. Research and Other Soft-Dollar Benefits***

While YAMS has no formal soft dollars program in which soft dollars are used to pay for third party services, YAMS may receive research, products, or other services from custodians and broker-dealers in connection with client securities transactions ("soft dollar benefits"). YAMS may enter into soft-dollar arrangements consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any particular client will benefit from soft dollar research, whether or not the client's transactions paid for it, and YAMS does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. YAMS benefits by not having to produce or pay for the research, products or services, and YAMS will have an incentive to recommend a broker-dealer based on receiving research or services. Clients should be aware that YAMS's acceptance of soft dollar benefits may result in higher commissions charged to the client.

#### ***2. Brokerage for Client Referrals***

YAMS receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.



### ***3. Clients Directing Which Broker/Dealer/Custodian to Use***

YAMS may permit clients to direct it to execute transactions through a specified broker-dealer. If a client directs brokerage, then the client will be required to acknowledge in writing that the client's direction with respect to the use of brokers supersedes any authority granted to YAMS to select brokers; this direction may result in higher commissions, which may result in a disparity between free and directed accounts; the client may be unable to participate in block trades (unless YAMS is able to engage in "step outs"); and trades for the client and other directed accounts may be executed after trades for free accounts, which may result in less favorable prices, particularly for illiquid securities or during volatile market conditions. Not all investment advisers allow their clients to direct brokerage.

#### **B. Aggregating (Block) Trading for Multiple Client Accounts**

If YAMS buys or sells the same securities on behalf of more than one client, then it may (but would be under no obligation to) aggregate or bunch such securities in a single transaction for multiple clients in order to seek more favorable prices, lower brokerage commissions, or more efficient execution. In such case, YAMS would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. YAMS would determine the appropriate number of shares and select the appropriate brokers consistent with its duty to seek best execution, except for those accounts with specific brokerage direction (if any).

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

#### **A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews**

All client accounts for YAMS's advisory services provided on an ongoing basis are reviewed at least annually by Lenoris Yarborough, Jr, President, with regard to clients' respective investment policies and risk tolerance levels. All accounts at YAMS are assigned to this reviewer.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Lenoris Yarborough, Jr, President. Financial planning clients are provided a one-time financial plan concerning their financial situation. After the presentation of the plan, there are no further reports. Clients may request additional plans or reports for a fee.

#### **B. Factors That Will Trigger a Non-Periodic Review of Client Accounts**

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

With respect to financial plans, YAMS's services will generally conclude upon delivery of the financial plan.

**C. Content and Frequency of Regular Reports Provided to Clients**

Each client of YAMS's advisory services provided on an ongoing basis will receive a monthly report detailing the client's account, including assets held, asset value, and calculation of fees. This written report will come from the custodian. YAMS will also provide at least quarterly a separate written statement to the client.

Each financial planning client will receive the financial plan upon completion.

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

**A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)**

YAMS does not receive any economic benefit, directly or indirectly from any third party for advice rendered to YAMS's clients.

**B. Compensation to Non – Advisory Personnel for Client Referrals**

YAMS does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

**Item 15: Custody**

When advisory fees are deducted directly from client accounts at client's custodian, YAMS will be deemed to have limited custody of client's assets and must have written authorization from the client to do so. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

**Item 16: Investment Discretion**

YAMS provides discretionary investment advisory services to clients. The advisory contract established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, YAMS generally manages the client's account and makes investment decisions without consultation with the client as to when the securities are to be bought or sold

for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share.

### **Item 17: Voting Client Securities (Proxy Voting)**

YAMS will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

### **Item 18: Financial Information**

#### **A. Balance Sheet**

YAMS neither requires nor solicits prepayment of more than \$500 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

#### **B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients**

Neither YAMS nor its management has any financial condition that is likely to reasonably impair YAM's ability to meet contractual commitments to clients.

#### **C. Bankruptcy Petitions in Previous Ten Years**

YAMS has not been the subject of a bankruptcy petition in the last ten years.

### **Item 19: Requirements For State Registered Advisers**

#### **A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background**

YAMS currently has only one management person: Lenoris Yarborough, Jr. Education and business background can be found on the individual's Form ADV Part 2B brochure supplement.

#### **B. Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any)**

Other business activities for each relevant individual can be found on the Form ADV Part 2B brochure supplement for each such individual.

**C. Calculation of Performance-Based Fees and Degree of Risk to Clients**

YAMS does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

**D. Material Disciplinary Disclosures for Management Persons of this Firm**

There are no civil, self-regulatory organization, or arbitration proceedings to report under this section.

**E. Material Relationships That Management Persons Have With Issuers of Securities (If Any)**

See Item 10.C and 11.B.