

Y H & C Investments Form ADV Part 2

Y H & C Investments Brochure: Cover Page

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This brochure provides information about the qualifications and business practices of Yale Bock and Y H & C Investments. If you have any questions about the contents of this brochure, please contact us at 702-350-0024 or email information@y-hc.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 Yale Bock and Y H & C Investments also is available on the SEC's website at www.adviserinfo.sec.gov.

Please note, the fact that Y H & C Investments and Yale Bock is a registered investment advisor does not mean that being registered implies a certain level of skill or training.

Y H & C Investments Brochure: Item 2- Material Changes

I am only discussing the material changes in the brochure since the last annual update of the brochure, which was in 2018. As the previous form had a different format, clients should understand this is a new format with additional information. The material changes in the brochure include additions to the minimum amount of capital a client can open an account with (section 7) and additional disclosures with respect to risks of investing in securities, which is in section 8. Section 10 covers Y H & C Investments relationship with other Investment advisers, the conflict of interest with clients and how Y H & C addresses the conflict. In addition there is clarifying information in section 11 regarding how Y H & C Investments and Yale Bock addresses conflicts of interests with respect to personal trading. There is also additional information on quarterly reviews of accounts in section 13, and more information on how Y H & C manages voting client proxies in section 17. In addition, Y H & C Investments is registered as an investment adviser in California but Nevada remains as the home state of the enterprise.

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Item 4: About Y H & C Investments & Yale Bock

Yale Bock is the 100% owner and operator of Y H & C Investments and is the sole employee. All operations are directed by Mr. Bock and he is responsible for all investment research, portfolio management, asset allocation, trading decisions, trade execution, risk management, and client communication. Mr. Bock has been investing his own capital for 30 years and client money since 2004. Mr. Bock earned a B.A. in economics from UC-Irvine in 1989, and an M.B.A from UC-Irvine in 1991. Mr. Bock earned the right to use the Chartered Financial Analyst designation in 2007. Y H & C investments manage capital for clients on a discretionary basis, depending on how a client wants it handled. In the majority of cases, clients want Y H & C to make all of the decisions, mainly because of time constraints for individuals. In some instances, clients work with the advisor by providing feedback, ideas, thoughts, questions, and opinions about which direction the account should go. Total Assets under management are 24.5 million. Total Discretionary assets under Y H & C are 18.0 million dollars and non-discretionary assets are 6.50 million dollars. Taxable accounts have 16.8 million, with 7.7 million in tax-advantaged accounts. Assets under management are calculated as of 12/31/2023.

Y H & C Investments forms an investment policy statement for each client that includes information on the specific return objectives, risk constraints, time horizon, risk tolerance, tax situation, liquidity needs, and any other pertinent information to the client. The document is used as a guide for the investment objectives and constraints for each client. Each client may include restrictions on assets which are not to be invested in, and Y H & C will respect and comply with those restrictions.

Fees constitute the annual percentage fee of 1% of assets managed including all services being provided- client account creation, analysis of client financial situation, investment policy creation and asset allocation, investment research, portfolio creation and monitoring, investment performance and documentation, and client communication. There is no difference between accounts which are managed using an annual fee and any other account- which may be charged a fixed fee. Fixed fees are negotiated with a client prior to the investor services agreement being signed and historically involve a family member, friend, or associate Yale Bock has known or had a prior business relationship for quite some time. Fixed fees are billed at the end of a quarter and do not involve an upfront payment by the client..

Other services offered to clients include strategic asset allocation, tactical asset allocation, portfolio analysis, investment research, portfolio management, trading decisions for buys and sells, documentation and performance assessment, billing, client communication, hedging strategies, scenario analysis, and risk management. As all clients are different, the greater the assets in a portfolio, the more extensive the services performed for a client may be- typically scenario analysis, the use of tactical asset allocation strategies and hedging instruments are possible risk management techniques which may be used to help meet client objectives, risk tolerance, and constraints. Y H & C Investments does not use wrap fees in the firm.

Item 5: - Fees & Compensation

The fee structure for Y H & C Investments is based on the initial capital invested. Y H & C uses a tiered approach to fees, as more capital is invested the fees that are charged become lower. All fees are charged at the end of each quarter. Each time more capital is added, the fee structure applies. All fees are subject to negotiation, depending on the client tenure and relationship with Yale Bock, as well as the amount of capital that is deposited with Y H & C Investments. Clients are notified by email and billed for fees incurred, and clients must agree to the fee prior to the capital being withdrawn from the clients account. Fees are billed quarterly. Clients will pay brokerage and other fees- see item 12 on brokerage practices. 401K Clients have similar fees with the same concept that as the amount of assets managed goes up the fee goes down. The fee structure is as follows:

1. From 0- \$500,000, Y H & C charges 1% of assets managed. For example, if a client deposited \$100,000, the yearly fee would be \$1,000.00 The \$1,000 fee is broken up into charges of \$250.00 per quarter. The \$250.00 is deducted from the Ameritrade brokerage account on the last day of each quarter (March 31, 2008, June 30, 2008, September 30, 2008, and December 31, 2008).
2. From \$500,000- \$2,500,000, YH & C charges 3/4 of 1% of all assets managed, or 75 basis points (1/100 of 1% is a basis point). For example, if a client deposited \$1,000,000, the yearly fee would be \$7,500. The \$7,500 is broken up into charges of \$1,875 per quarter. The \$1,875 is deducted from the Ameritrade brokerage account on the last day of each quarter (March 31, 2008, June 30, 2008, September 30, 2008, and December 31, 2008).
3. From \$2,500,001> Y H & C charges .50 of 1% of all assets managed, or .50 basis points. For example, if a client deposited \$3,000,000, the yearly fee would be \$15,000. The \$15,000 is broken up into charges of \$3,750 per quarter. The \$3,750 is deducted from the Ameritrade brokerage account on the last day of each quarter (March 31, 2008, June 30, 2008, September 30, 2008, and December 31, 2008).
4. For accounts transferred into Ameritrade from another custodian, whatever the market value of the assets that comes in becomes the beginning capital base.
5. In most cases, multiple accounts that are managed are combined and the fee for the client is determined by total assets, not for each account. The reason for this is to concentrate on the performance of the total number of assets, not on specific accounts. There are specific instances where one account of multiple accounts will be charged fees, and the others are not as an account may have substantially outperformed, and the other accounts did not. In these instances where a specific account is charged, clients are notified in advance and clients agree to this outcome before any billing takes place.
6. Accounts that do not have positive dollar returns as compared to the initial amount invested are not charged an applicable quarterly fee, which means Y H & C must have positive capital appreciation of the total assets for the client, as compared to the initial capital transferred to Y H & C Investments, or there is no charge for the client. For some clients, it also means not charging

fees until the client has returned to the initial cost basis of the total assets being managed. Y H & C Investments does not charge a separate performance based fee.

7. $\text{Return} = (\text{Total Assets At the End of the Present Quarter} - \text{Any capital contribution}) / (\text{Total Assets Initially transferred})$

8. Assets transferred during a month (not on the first day) will be considered under management at the start of the next month, or on previously agreed upon date, or on the first day the assets are under the discretion of Y H & C Investments. For example, if assets get transferred to TD on May 15, 2008, the official date calculations for fees start will be June 1, 2008. Assets are not considered under management the day an account is requested to be closed.

9. Under some circumstances, a fixed yearly fee for managing clients assets can be arranged. For example, if a client has \$1,000,000 in assets, a yearly fee can be applied and broken up into quarterly billings. Under both the fixed or asset quantity based fee structure, Y H & C Investments fees will not exceed 3% of total assets under management per annum. Lower fees may be available for comparable services and may be available from other sources.

10. Lower fees for comparable services are available at other firms, or using passive investment strategies.

Item 6- Performance Based Fees

Y H & C Investments does not charge a separate performance based fee.

Y H & C Investments Item 7: Types of Clients

Y H & C Investments manages money for primarily individuals, and in 2013 added it's first profit sharing plan for a small business. In 2020, the company started advising 401K and profit sharing plans for existing clients. The company has been in business since 2003, and started managing money for clients in 2004. The minimum account size for a client is \$50,000, unless you are a family member, a friend, or are acquainted with a family member or friend. Interactive Brokers Asset Management (formerly Covestor) offers a service for it's clients whose assets are mirroring (replicating) a model portfolio of Y H & C Investments through Interactive Advisors. Y H & C Investments manages a self-funded portfolio on the Interactive Advisors platform that IB clients may choose to subscribe to. Any trading he conducts in this portfolio is replicated in subscribing clients' accounts. Y H & C Investments does not provide investment advice to Interactive Advisors Clients.

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

For all investors, the process of allocating capital involves deciding what percentage of capital should go to each asset class. Y H & C specializes in placing the greatest concentration of capital in the equity asset class and that is our focus when we make decisions on where to place capital. An example of a typical strategic asset allocation for a young or middle aged investor is 60% allocated to stocks, 20% fixed income investments, 10% real estate, 5% commodities and 5% cash. Each individual is different in terms of what they are trying to achieve with their investment objectives. However, as the majority of clients of Y H & C are working professionals, the primary asset class the company invests in is common stocks. Common stocks are considered the most risky asset class. As such, INVESTING IN COMMON STOCK SECURITIES INVOLVES THE RISK OF A LOSS OF YOUR CAPITAL WHICH THE CLIENT MUST BE PREPARED TO BEAR.

Y H & C Investment Process:

Y H & C believes that researching individual investment opportunities requires extensive work before capital is allocated. Y H & C tries to earn the highest returns possible, which means the majority of our investments will be in the common stocks of growth companies. However, as there can be great possibilities for higher returns in value stocks, Y H & C also is a value investor. The reality is value and growth investing is tied at the hip. The following are steps Y H & C tries to go through when looking at unique investment opportunities, in particular individual equities in the public markets. It may be that not all steps are implemented, especially if a security is one which has been owned for many years and is very familiar with.

1. Fundamental analysis of the industry of the specific issue.
2. Competitive positioning of the individual company within its industry relative to its competitors.
3. Analysis of the past, present and future operations of the specific company, with emphasis on growth opportunities.
4. Fundamental analysis of the operating performance of the specific company- metrics like gross margin, operating margin, net margin, return on equity, return on assets, turnover ratios, inventory and accounts receivable ratios.
5. Fundamental analysis of the financial situation of the company, including balance sheet metrics like cash levels, debt levels, contingent liabilities, lease obligations, and off balance sheet arrangements.
6. Analysis of the quality of earnings of the company.
7. Analysis of the corporate governance of the company including the role of the CEO, board of directors, nominating, audit, and compensation committee structures and conflict of interests or independence of the board.
8. Analysis of the management of the company and any conflicts of interest that may exist.

9. Specific research into a company's financial filings- including annual report and 10-Q filings, along with any 8-K filings, insider trades, and recent news involving the company.
10. Valuation Analysis of the current market value of the enterprise, market capitalization, and comparison of those metrics against industry competitors and the overall market.
11. Valuation analysis of the current issue versus its operating metrics.
12. Analysis of management ownership of the equity, stock option dilution, and share buyback possibilities.
13. Analysis of free cash flow of the company versus competitors.
14. Application of the current economic environment and the effect on the specific company.

Risks in Owning Securities, Especially Common Stocks

Investing in securities, especially common stocks, involves risking capital today in the idea of having more capital tomorrow. There can be no assurance that an investor will make money and could lose all of the money which is invested with Y H & C Investments. Past performance is not indicative of future success or returns. The following are specific risks when investing in securities, especially equities. These risks do not include all possible risks, as one could argue there are thousands of potential hazards when investing.

1. Incorrect Decisions by Y H & C- If Yale Bock analyzes a security incorrectly, the market value of the security can go down and a customer may lose money
2. Financial Risk- Specific companies may have indebtedness which they cannot pay back, or pay the interest on, resulting in the loss of market value of the equity or debt.
3. Management Risk- The management of a company may make business decisions which are not accurate and result in the business losing market share, losing business, failing to make timely payments on indebtedness, making decisions in management and affiliated persons or company's best interest, and the result could be a loss of value for shareholders or bondholders.
4. Business Risk- Each business has specific market conditions which managers must anticipate and make decisions for a company to prosper. In the event the business has market conditions which change and a management team makes incorrect decisions, the equity or debt of a company may lose value if the operating conditions are difficult and a company cannot adapt.
5. Operational Risk- Businesses have a normal course of operations on a daily basis which involve specific processes and procedures. If a business does not have these procedures in place, efficiency can suffer and the business may not be profitable. If incorrect processes are in place, or are not followed, the business can suffer. In the event of either case, the equity or debt of a specific issuer can lose market value due to poor operations.
6. Supplier Risk- If a company is overly dependent on specific suppliers to make their products, and a supplier decides to void a contract with the company, the business can suffer a loss, affecting the market value of the equity or debt.
7. Contingent Liabilities- In the event a company is a guarantor of liabilities of affiliated companies and cannot meet its obligations, the market value of equity and debt can lose value.
8. Related Party- In the event a company has business dealings with related parties of the management team and cannot meet those obligations, or those obligations are not in the best interest of the specific company, the market value of the equity or debt can lose value.
9. Competition- Many companies have competitors who have superior financial resources to gain market share. If a company has superior competitors, it may lose business to those competitors and the equity and debt securities can lose market value.
10. Exogenous Events- The world is an ever changing place and shocks to the world economy can cause the loss of value to the general equity and debt markets.
11. Market Risk- Capital markets constantly fluctuate, and a company can lose market value for

a long period of time, especially in both debt and equity markets.

12. Government Regulation- In the event the federal government, state, and or local government changes the existing regulations or imposes new laws in a specific industry, or a foreign government changes or adopts new laws in the industry, these changes can have a material impact on a company and the market value of the stock or debt.

13. Exogenous Events- The world constantly changes, and natural disasters and conflicts take place. Examples include hurricanes, tornados, regional or global disputes between neighboring countries, extended periods of weather (dryness, rain), or pandemics (Covid virus with multiple interactions). All can and will impact markets on a temporary and possibly an extended basis. All can affect the market value of equity and debt securities.

Item 9- Disciplinary Information

Y H & C Investments was disciplined and paid a fine the Nevada Secretary of State for failing to file the annual form ADV in a timely manner many years ago. Y H & C Investments was also fined by the Nevada Secretary of State in 2017 for not updating address information in a timely manner.

Item 10: Other Financial Industry Affiliations

Y H & C Investments has no management persons registered as a broker dealer or registered representative of a broker dealer. Y H & C Investments has no management persons registered as a futures commission person, commodity pool operator, commodity trading adviser. Y H & C Investments has no relationship or arrangement with any entity which is material to the business- including broker dealers, municipal securities dealers, government securities dealer or brokers, other investment advisers or financial planners, banks, thrifts, accountants, lawyers, insurance companies, pension consultants, real estate brokers or dealers, and any syndicate or sponsor of limited partnerships. Y H & C Investments does not recommend or select other investment advisers directly or indirectly for compensation.

1. Y H & C uses Charles Schwab and Interactive Brokers as its custodians and broker and as such, is not able to guarantee clients best price or execution because of a lack of competition for trading arrangements and fees. Y H & C partners with Vestwell to manage 401k accounts and Vestwell uses Bank of Mellon as their custodian for all assets.
2. Y H & C manages capital for clients in separate accounts outside of TD Ameritrade. In the event of such an arrangement, the client may not receive the best price or execution because the account is not at Ameritrade.
3. Y H & C Investments provides a model portfolio to Interactive Advisors. In the event a person or institution chooses to mirror Y H & C's model portfolio on Interactive Advisors, Y H & C has a revenue sharing agreement with Interactive Advisors .
4. Y H & C has a company account with a SEC advisor; Interactive Advisors, where the Interactive Advisors account mirrors the trades made by Y H & C Investments.. To minimize potential conflicts of interests, the master accounts for Y H & C are linked to the trading operations at Interactive Advisors.
5. In the Interactive Advisors account, the trades are executed based on the master portfolio, so there is no possibility for a conflict. In some instances, there may be a situation where the same security is held in the Y H & C Investments accounts, Interactive Advisors account and in a personal account of Yale Bock or a family member.
6. If Yale Bock decides to sell the position, or options against the position in the personal account, that would be considered a conflict of interest. If Yale Bock sells the same position in his personal account, that could be considered a conflict of interest. However, those actions typically would not be material events to the client as they will not have a material effect on the price of the stock. If that situation does occur, trades are placed at the Interactive Advisors accounts before company or personal accounts.

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

Y H & C Investments buys and sells securities in which Yale Bock and Y H & C Investments has a material financial interest. The conflict is mitigated in a variety of ways. First, clients receive a Form ADV part 2 prior to entering into any agreement with Y H & C Investments. The Form ADV discloses such conflicts. Second, securities which are bought and sold for clients are consistent with and based on the client's investment policy statement. The investment policy statement is reviewed by each client prior to any securities being bought or sold for any client. In the investment policy statement, the specific kinds of securities and specific names of individual securities are mentioned. In the event a client has disagreement with a specific security being bought because of a conflict, then it is not purchased or sold. Third, clients receive a quarterly statement with the value of each account and the specific securities in the account. In the event a client mentions a problem with a security, the security is sold. In the event a security is owned by Y H & C and a client and is sold, it is sold in a block trade at the same time as the client or for the client first.

The code of ethics Y H & C Investments uses is patterned after the CFA Institute Code of Ethics. Yale Bock is a charter holder of the CFA Institute. Yale Bock provides a copy of the Y H & C Investments Code of Ethics to any client or prospective client upon request, as well as the CFA Code of Ethics. One of the main principles of the CFA Code of ethics is to put the client's interests ahead of the firm or the adviser's personal interests. Yale Bock, and his immediate family own equity securities it buys for clients. As such there is a conflict of interest when this situation occurs. As each client is different, including Y H & C and Yale Bock, all have different objectives, time frames, liquidity needs, tax situations, and risk constraints which are specific. For example, there have been instances where a position being held by both clients and Y H & C Investments are being taken private by a private equity company or group of investors. A client may need liquidity and the position needs to be sold for this individual, whereas it is held for the rest of the clients and Yale Bock and Y H & C Investments, or vice versa. Y H & C and Yale Bock generally are long term investors and want to hold securities as long as possible, if there is no change in underlying circumstances of a stock. There may be situations where a stock has a significant gain in a short period of time where Yale Bock and Y H & C may sell the stock to take the gain. There may be situations where Yale Bock and Y H & C believe a stock will continue to underperform and will sell the stock. If either of these situations occurs, each client will be notified prior to buying or selling so they can make their own decisions about what course they want to proceed with.

Client's specific circumstances are going to be different from Yale Bock and Y H & C. In that light, Y H & C will manage those clients' investments as a fiduciary based on the investment policy statement. The procedure typically followed when there is a conflict of interest with a personal holding is as follows: At times, Y H & C trades equity securities using block trades at Charles Schwab. In the event of such a trade, clients receive the pro rata share of the block along with the standard price of the share- all attempts are made to trade the blocks in such a manner. There may be instances where multiple clients receive different prices for the same security

because of unforeseen circumstances or an inability to make the trade at the same price for all clients. In these cases, all efforts are made to make trades as close to the same price as possible. Unless unusual circumstances occur, the differences in the share prices of trades on the same security are not material- usually <5% and should not impact the performance of the security in clients accounts. Just as importantly, each client's buy or sell activity is based on their individual circumstances, so there may be cases where the same stock is bought in some clients accounts because it fits their objectives, and sold in the Y H & C account because of the company objectives- and vice versa. Still, the standard procedure is to use the CFA taught method of allocating the trade's pro-rata at the same price, if possible.

Item 12: Brokerage Practices

Y H & C Investments uses Charles Schwab as the broker dealer and custodian for most clients. Y H & C Investments has also added Interactive Advisors and Charles Schwab as a custodian. All are online brokers which offer taxable and tax advantaged accounts for individuals, small businesses, foundations, endowments, and nonprofit organizations. Vestwell is used for 401k plans, which offers exchange traded funds, target date funds, indexes, and mutual funds. The fees at the custodians are low and reasonable for clients, and trades can be placed and allocated in blocks. They also have a wide variety of mutual funds in stocks and bonds, exchange traded funds, and options which clients have access to. As such, these fit the current needs of Y H & C Investments and its clients. Y H & C uses Charles Schwab and Interactive Brokers as its custodian and as such, is not able to guarantee clients best price or execution because of a lack of competition for trading arrangements and fees. Y H & C Investments does not receive soft dollar benefits from any broker and as such, has no conflict of interest regarding soft dollar benefits. Y H & C is not compensated by any broker dealer, commercial bank, or investment bank for any underlying business or trading business. Y H & C uses Charles Schwab, and Interactive Brokers as its broker-dealer and is not compensated in any way by either, including soft dollar arrangements for trading. Y H & C Investments has never been involved with soft dollar benefits.

Y H & C manages capital for clients in separate accounts outside of Charles Schwab. In the event of such an arrangement, the client may not receive the best price or execution because the account is not at Charles Schwab. In this situation, it may cost the client more money because of the outside arrangements with another broker dealer which is not Charles Schwab. Y H & C Investments does not use client brokerage commissions to obtain research or other benefits. Clients may direct an account, but Y H & C Investments cannot ensure self directed accounts will achieve most efficient execution of trades and may cost clients if they elect to self direct the account. Currently, no clients self direct their accounts.

The following procedure is typically followed when the same security is bought or sold for multiple clients at the same time. At these times, Y H & C trades equity securities using block trades at Schwab. In the event of such a trade, clients receive the pro rata share of the block along with the standard price of the share- all attempts are made to trade blocs in such a manner. There may be instances where multiple clients receive different prices for the same security because of unforeseen circumstances or an inability to make the trade at the same price for all clients. In these cases, all efforts are made to make trades as close to the same price as possible. Unless unusual circumstances occur, the differences in the share prices of trades on the same security are not material- usually <5% and should not impact the long term performance of the security in clients accounts.

Item 13: Review of Accounts

Each account is reviewed quarterly, unless there is a large drop in the market value of clients assets- no specific number but 20% or more would be a good guide. The reviewer is Yale Bock, President, and he manages and oversees all the accounts. The client is sent a report each quarter which includes the total market value of the account, performance in the quarter as compared to the S & P 500 and other indexes. Also included are reports including the asset allocation, income and expenses, realized and unrealized gains, transactions during the quarter, and broker commissions. A letter to each client explaining what took place during the quarter, the specific strategy used and the performance, and a billing statement detailing the fees charged to the account accompanies the report. 401k clients receive quarterly reports from Vestwell detailing the holdings in the account, performance, and billing which took place. In the event Y H & C makes a mistake on the buying or selling of a security, Y H & C has an error account at Schwab and there is a period of time where the error can be corrected, usually within a week. In those instances, Y H & C corrects the mistake and bears the cost of the mistake. Clients receive the security which they were intended to get at the best price which Y H & C Investments can secure.

Item 14: Client Referrals and Other Compensation

Y H & C Investments neither directly or indirectly compensates any person or entity for a client referral, and has not done so at any time.

Y H & C Investments does not have custody over client's funds or securities. Y H & C clients receive quarterly account statements from Charles Schwab, Interactive Brokers, and 401k clients receive statements from Vestwell. If Y H & C Investments manages client accounts at other brokers it uses Charles Schwab, and Fidelity. Clients should compare the quarterly statements from Y H & C Investments to Interactive Brokers, Charles Schwab, and Fidelity to make sure both statements accurately reflect the current status of the accounts.

Item 15- Custody

Y H & C Investments does not take custody of clients' securities. All securities and cash are held with Charles Schwab, and Interactive Brokers. Vestwell uses BNK Mellon to custody the 401K assets of Y H & C Investments 401K clients.

Item 16: Investment Discretion

Y H & C Investments manages capital for clients on a discretionary basis, depending on how a client wants it handled. In the majority of cases, clients want Y H & C to make all of the decisions, mainly because of time constraints for individuals. In some instances, clients work with the advisor by providing feedback, ideas, thoughts, questions, and opinions about which direction the account should go. Clients may place restrictions on the kinds of assets where capital is placed, or on the types of securities which should not be bought- gambling, smoking stocks, etc. Y H & C complies with all such requests. Before assuming discretion of an account and any capital, Y H & C requires an investor services contract with the client. The investor services contract consents to Y H & C a limited power of attorney. Y H & C Investments may manage portfolios on a non-discretionary basis, and if so, the firm will secure client's permission prior to effecting securities transactions.

Item 17: Voting Client Securities

Y H & C votes proxies for the firm account and client accounts based on what it considers in the best interest for the client and Y H & C. Generally, the voting policy of Y H & C is companies that are approving the same directors and the same accounting firm receive a positive vote. All equity based option compensation plans are evaluated but generally are voted against, especially if it dilutes the holdings of shareholders. All other items are evaluated on an individual basis based on whether or not it is in the best interest of shareholders to build more equity value for the long term, if so, and then the item will get a positive vote. In the vast majority of cases, clients have Y H & C vote for their holdings. Clients may direct the Y H & C vote by contacting the firm by email, phone, or with a written request. If a client wants to obtain information on how Y H & C voted their securities, the client may email, call, or write and request how Y H & C voted their securities. In the event a client disagrees with Y H & C over a particular item for a company vote, Y H & C will vote the way the client directs. If there is a conflict of interest regarding the interests of Y H & C and a client with respect to voting their securities, Y H & C will disclose the conflict to the client and consult with the client before voting the shares. Clients may obtain a copy of Y H & C voting policies by requesting them, or reading the quarterly letters and Form ADV 2 documents which are sent by Y H & C Investments.

Item 18: Financial Information

There is no financial situation which would reasonably impair Y H & C Investments or Yale Bock and the ability to meet contractual commitments to clients. Y H & C Investments does not collect prepayments of \$500 or more six months in advance. As a matter of operating practice, Y H & C Investments has never received prepayment for services rendered. Y H & C Investments and Yale Bock have not been the subject of any bankruptcy petition at any time, including the last ten years.

Item 19: Requirements for State-Registered Advisers

Educational and Most Recent Working Experience

Yale Bock is the principal management person of Y H & C Investments. Mr. Bock earned a B.A. in Economics from UC-Irvine in 1989, and a MBA from UC-Irvine in 1991. He earned the Chartered Financial Analyst designation in 2007. Mr. Bock has been involved in the management of a variety of small businesses owned by his family, including Pawn Shops, Retail Mens and Womens Clothing, Retail Liquor, and short term loans. At the present time, Mr. Bock is in management of a family business, a pawn shop, in Las Vegas.

Y H & C Investments is located at 213 Popolo Drive, Las Vegas, NV 89138 in his residence. The family business takes up to 40 hours a week of Mr. Bock's time. The business locations have 4 computers, which all have access to the internet. In addition, Mr. Bock has equipment at home to ensure operations are possible from different locations, and critical data is backed up in various different spots. With the growing number of assets under management, attention to the investment business demands a great portion of Mr. Bock's time, and many hours of market and investment analysis are performed at the business location with no operational issues as of this date. The existing working situation will continue for the foreseeable future. The company stores website related files on the server where the web site is hosted, at Godaddy.com, the world's largest hosting company. Client records are stored on the home computer. Client performance data and reports are shared using the cloud site of the performance measurement company, Bailey Software (www.fundmanagersoftware.com).

Security and Advertising

All security for the company web site is handled by Godaddy.com. Emails sent to the company are through yale@y-hc.com, information@y-hc.com, and ybock@cox.net. The emails are backed up through Google, Cox Communications, and Godaddy.

Advertising and Social Networking Compliance

Y H & C Investments and Yale Bock have social networking accounts at Twitter, Facebook, Google Blogs, and on the Y H & C Investment Website. Yale Bock posts a monthly newsletter. All are free to the public, and all contain the following disclaimer: As always, in any company mentioned here, past performance is not a guarantee of future returns. Investing involves risk of losses on invested capital. One should research any investment and make sure it is suitable with your objectives, risk tolerance, risk profile liquidity considerations, tax situation, and anything else pertinent to your financial situation. Also, the CFA credential in no way implies investment returns will be superior for any charterholder. All social media posts are backed up through RegEd Inc.

Y H & C Investments is engaged in any paid search and online advertising at the present moment. The company has a video on Youtube.com and on it's own web site which is an

introduction
to the firm.

Y H & C Investments may advertise in the future at investment shows or investment virtual shows. Securities analysis, investment research, trading activity, client communication, and 90% or more of all related business activity is conducted via computers. Mr. Bock has computers both at the business location and at home, as well as a laptop computer, two tablet computers, and a smartphone. As long as Mr. Bock has access to any of these devices, business operations can be expected to conduct efficiently, as has been the case since the start of the business. Customer contracts, investment policy statements, quarterly client letters, client account statements, trade executions, and vital records are stored via computer, and hard copy at the business location and a copy is made for computer storage via cloud storage at Google. In addition, hard copies of quarterly letters, customer contracts, policy statements, and other vital documents are stored at Mr. Bock's home computer, and in some cases in hard copy or at the company website. Mr. Bock has spent significant time, effort, and money in building Y H & C Investments into a viable business. Mr. Bock has a great percentage of his net worth invested in the equity markets in many of the same equities as his clients.

Disclosures

Y H & C Investments does not charge performance fees. Y H & C Investments has not been involved in any event regarding being found liable for damages in excess of \$2,500 or found liable in a civil, self regulatory organization, or administrative proceeding in any situation listed in Item 19, Part D 1 and 2. Y H & C Investments and Yale Bock have no relationship or arrangement with any issuer of securities nor has it one in its operating history.

All clients are required to sign a Investors Services Agreement before having an advisory relationship. Before the agreement is signed, any material conflict of interest is disclosed to the client in a Form ADV. The Form ADV is sent to each client, and annually as well, with an Investment Policy Statement.

Business Continuity Plan

The business continuity plan (BCP) for Y H & C Investments is to have the custodian of each individual client transfer the account with Y H & C Investments Institutional to an individual account for the client using the same custodian. In the event of incapacitation or death, Jhanine Bock, will assume responsibility to help accomplish this action. Mrs. Bock will also be responsible for notifying vendors, regulatory bodies, and institutions of the situation, which includes filing form ADV-W on the IARD System.

