

Part 2A of Form ADV – Disclosure Brochure



Altman Sacks Corporation

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This brochure provides information about the qualifications and business practices of Altman Sacks Corporation, “ASC”. If you have any questions about the contents of this Brochure, please call (310) 678-6021 or by email at AltmanSacks@gmail.com. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority. Altman Sacks Corporation is registered as an Investment Adviser with the State of California. Registration of an Investment Adviser with the State of California, SEC, or any other state securities authority does not imply any level of skill or training.

Additional information about ASC is available on the SEC’s website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number which is known as a CRD number. Our firm’s CDR number is 305420.

ITEM 2 - MATERIAL CHANGES

Revised June 2, 2025

The purpose of this page is to inform you of any material changes since the last annual update to this brochure. If you are receiving this brochure for the first time this section may not be relevant to you.

Altman Sacks Corporation reviews and updates this brochure at least annually to make sure that it is still current.

- There have been at least seven prior annual updating amendments for this brochure.
- ASC has a website which is for informational purposes only. This website is not a client portal. The worldwide web address to this website is: <https://www.altmansacks.com>
- Benjamin Yashar is currently employed by DGA-PPHP as a software programmer. DGA-PPHP, which is in the business of providing pension and health insurance to film directors and assistant-directors, is in Los Angeles. His employment work hours are from 7:30 am to 6:00 pm, Tuesday to Friday. Benjamin Yashar devotes Saturdays and Mondays, and sometimes Sundays, to ASC's activities – Such as producing security analysis documents. Please see ITEM 10 on page 11 for more details.
- There are no other material changes.

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ITEM 4 - ADVISORY SERVICES

A. Firm Information

Altman Sacks Corporation (“ASC,” the “Advisor,” the “Firm,” “we,” “our,” or “us”) is a California-based registered investment advisor, and it is organized as an S Corporation under the laws of the state of California. ASC’s legal date of formation was on 06/09/2015. However, the Firm did not file for investment advisory registration with California until 09/11/2019. The Firm has engaged in the business of providing computer programming services on a consulting-basis since its inception. ASC is owned and operated by Benjamin B. Yashar. This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by ASC after 09/11/2019.

B. Advisory Services Offered

ASC offers investment advisory services to individuals and other entities as described in Item 7 - Types of Clients in California (each referred to as “Client,” “Clients,” “you,” or “your”). ASC will provide Investment Supervisory Services and Portfolio Management Services in the form of Portfolio Management for Individuals and/or Small Businesses, Retirement and Pension Consulting Services, and Selection of other advisers (including private fund managers). However, ASC will not provide securities’ custodial or other administrative services. At no time will ASC accept or maintain custody of a Client’s cash or securities, except for an authorized deduction of the Advisor’s fees from Client’s account. All Client’s assets will be managed within their designated separate brokerage or pension account pursuant to the Client investment advisory agreement. In addition to the general services described above, ASC offers the following specific services to advisory Clients.

Investment Supervisory Services - Portfolio Management for Individuals and/or Small Businesses

The Advisor provides continuous and regular supervisory or management services through personal Client contact and interaction while providing either discretionary or non-discretionary Investment Supervisory Services in the form of Portfolio Management for Individuals and/or Small Businesses. We provide both discretionary and non-discretionary Investment Supervisory Services, and the Client can only choose one type of service but not both. In a discretionary Investment Supervisory role, you grant and appoint us to have unlimited and unrestricted discretionary authority over the management of your account, to invest and reinvest, direct and manage the assets that are held in your account.

In a non-discretionary Investment Supervisory role, you do not grant discretionary authority over the management of your account to us, but the Advisor based on your needs has ongoing responsibility to select or make recommendations as to specific securities or other investments the account may purchase or sell, and if such recommendations are accepted by the Client, the Advisor is responsible for arranging or effecting the purchase or sale. You will be notified prior to the sale or purchase of any or all securities held in your account, and we will not change your portfolio nor execute any transactions in your account without your prior written approval.

ASC works with Clients to create an asset portfolio which is designed for long-term investment, and our investment strategy is primarily focused on long-term investments, but the Advisor may buy, sell, or re-allocate security positions which have been held for less than one year to meet the objectives of the Client or because of drastic changes in the United States and global economic conditions.

The Advisor will work with each Client to identify their investment and financial objectives, circumstances, marginal tax bracket, guidelines, policy, risk tolerance, needs and goals, and any restrictions they might have (“Investment Objectives”). The Advisor will construct, implement, and monitor the Client’s portfolio

to ensure it meets their Investment Objectives, and our Investment Supervisory recommendations are based on our understanding of the Client's Investment Objectives. Advisor will determine the asset allocation of securities in cash, equity, and bonds for Client's portfolio. We make Investment Supervisory recommendations based on the information that the Client provides about their Investment Objectives. Our suggestions may be limited if the Client does not provide accurate and complete information. It is your responsibility to keep us informed of any changes to your Investment Objectives which includes your objectives and restrictions.

Each Client does have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio which is subject to its approval by the Advisor. Clients may request restrictions on the accounts such as when a Client needs to keep a minimum level of cash in the account or does not want the adviser to buy or sell certain specific securities or security types in the account.

We typically recommend Exchange-Traded funds ("ETFs"), stocks, and precious metals such as gold and silver depending on the current state of the United States and global economies, and whether the United States' stock market is bearish or bullish. When it is wise, we may recommend investments in bonds, municipal securities, U.S. treasury securities, and other investments.

Clients who utilize our advisory services will have their assets custodied at Fidelity Investments ("Fidelity"), Charles Schwab & Co., Inc. ("Schwab"), or other brokerage firms.

The Advisor will evaluate and select ETFs, mutual funds, stocks, and bonds (collectively referred to as "Asset" or "Assets") for inclusion in the Client's accounts. The Advisor may advise redistributing the Asset allocations to diversify each account, and ASC may advise specific security positions to increase sector or asset class allocations. The Advisor may recommend employing cash positions as a possible hedge against stock market movement which may adversely affect the portfolio. The Advisor may recommend selling positions for reasons that include, but are not limited to, realizing capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of certain positions in the portfolio, changes in risk tolerance of Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client's risk tolerance.

The Advisor will only receive its agreed-upon Investment Supervisory fees. ASC does not receive referral fees, and ASC does not receive any other compensation for our services as described below under Item 5 - Fees and Compensation and Item 14 – Client Referrals and Other Compensation. ASC does not pay referral fees.

Portfolio Management Services - Portfolio Management for Individuals and/or Small Businesses

Portfolio Management Services in the form of Portfolio Management for Individuals and/or Small Businesses applies when the Adviser's management of Client's account ***is not continuous and regular*** Investment Supervisory Services, and therefore is not Investment Supervisory Services. In the event that the Advisor's services will include or be limited to monitoring, analysis, and reporting of the performance of certain or all investments in Client's account, the Advisor, in this capacity, may recommend changes, provide the Client with reports or other information, and periodically review the suitability of the investments for Client, and the Advisor will be paid on an hourly basis for the Advisor's services. Except as otherwise instructed by Client, custodian will provide the Client, at least quarterly, a list of all assets held in the account, asset values, and all transactions affecting the account assets, including any additions or withdrawals. In addition, the Advisor will be compensated based upon the time spent with Client during Client's visit on an hourly basis. **ASC will not be providing financial planning services.**

Retirement and Pension Consulting Services

Retirement and Pension Consulting Services applies if any assets of the Client includes (1) pension or other employee benefit plan (including any 401(k) plan) governed by the Employee Retirement Income Security Act of 1974, as amended ("ERISA"); (2) tax-qualified retirement plan (including a Keogh plan) under Section 401(a) of the Internal Revenue Code, as amended (the "Code"), and not covered by ERISA; or (3) an individual retirement account ("IRA") under Section 408 of the Code. If certain Client assets are for a plan subject to ERISA, the Client appoints the Advisor, and the Advisor accepts its appointment, as an "investment manager" for purposes of ERISA and the Code, and the Advisor acknowledges that it is a "fiduciary" within the meaning of Section 3(21) of ERISA and Section 4957(e)(3) of the Code (but only with respect to the provision of services described in the Investment Supervisory Services - Portfolio Management for Individuals and/or Small Businesses above).

Selection of other advisers (including private fund managers)

Advisor may, on occasion, recommend that all or a portion of the assets in the account be managed by an outside registered investment advisor, outside money manager, or a sub-Advisor ("Sub-Advisor"). Prior to recommending and selecting any sub-advisor, the Firm will confirm that the sub-advisor is properly licensed and is registered as an investment adviser. The Client will be charged the **Allocation Fee** by the Advisor as stated in the **Fee Schedule** section below. The Client will not be charged a separate fee by the said Sub-Advisor. The Advisor will subsequently share a portion of the **Allocation Fee** with the Sub-Advisor based on the agreement between the Advisor and the Sub-Advisor for the sub-advisory services, and the Advisor will pay the Sub-Advisor's Fee ("Sub-Advisor's Fee"). In all discretionary accounts, except to the extent the Client directs otherwise, the Advisor is authorized to use its discretion in selecting or changing the Sub-Advisor to the account without prior approval from the Client. Client may be required to execute a limited power of attorney with a Sub-Advisor that is selected by the Advisor.

C. Client Account Management

Prior to engaging ASC to provide Investment Supervisory Services or Portfolio Management Services in the form of Portfolio Management for Individuals and/or Small Businesses, each Client is required to enter into an investment advisory agreement with the Advisor where the agreement defines the terms, conditions, authority, and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Policy Statement – The Advisor and the Client may develop a statement that summarizes the Client's investment goals and objectives along with the comprehensive investment strategies to be employed to meet the Client's objectives.
- Asset Allocation – The Advisor will develop a tactical asset allocation that is targeted to meet the investment objectives, time horizon, financial situation, and risk tolerance for each Client. Tactical asset allocation is different from the traditional strategic asset allocation. A tactical asset allocation requires active management to meet the changes in the conditions of the United States and global economies.
- Asset Portfolio Construction – The Advisor will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – The Advisor will provide active investment management and ongoing oversight of the Client's portfolio.

D. Assets Under Management

As of June 2, 2025, ASC has \$0 of regulatory assets under management on non-discretionary basis.

As of June 2, 2025, ASC has \$0 of regulatory assets under management on discretionary basis.

Clients may request more current information at any time by contacting the Advisor.

We describe the fees charged for investment consulting services below under **Item 5 - Fees and Compensation**.

We don't participate in wrap-fee programs by providing portfolio management services.

ITEM 5 - FEES AND COMPENSATION

A. Fees for Advisory Services

Investment Supervisory Services - Portfolio Management for Individuals and/or Small Businesses

Annual fees for investment management range from 1.0% to 2% of the assets under ASC's management depending on the total size of the assets to be managed and based on the agreement signed with the Client. Fees are calculated and billed at the beginning of each calendar quarter based on the total market value of the assets under management in the Clients' accounts at the close of the last business day of the preceding quarter.

Investment Supervisory fees in the first quarter of service are prorated to the inception date of the account to the end of the first quarter. Fees are not negotiable. The Client's fees are calculated based on the aggregate assets under management with the Advisor in all Client's accounts. All securities held in the accounts managed by ASC will be independently valued by the custodian. ASC will not have the authority or responsibility to value portfolio securities. Pursuant to California Code of Regulations Section 260.238(j), ASC hereby discloses that Clients may receive the same or comparable services from other investment advisors at a lower fee.

ASC in its sole discretion may negotiate to waive its stated investment management fee or charge a lesser investment management fee based upon certain criteria (e.g., anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing client, account retention, etc.).

Portfolio Management Services - Portfolio Management for Individuals and/or Small Businesses

From time to time, ASC provides advisory services to Clients on an hourly basis at a rate not to exceed \$300 per hour billed in arrears. This hourly rate is not negotiable. ASC may also provide services at a reduced rate or free of charge for certain Clients (such as family members). **ASC will not be providing financial planning services.**

The Advisor's fee is exclusive of, and in addition to, brokerage commissions, transaction fees, and other related costs and expenses, which may be incurred by the Client. However, the Advisor will not receive any portion of these commissions, fees, and costs.

Other Fees and Expenses

The fees described above typically do not include custodian fees. Clients pay all brokerage transaction charges, stock transfer fees, and/or other similar charges incurred in connection with security from the assets in the account. These charges are in addition to the fees that the Client pays to the Advisor.

In addition, any mutual fund shares held in Client's account may be subject to deferred sales charges, 12b-1 fees, early redemption fees, and other fund-related expenses. The fund's prospectus fully describes the

fees and expenses. Mutual funds and ETFs (“Funds”) pay advisory fees to their investment managers, which are indirectly charged to all shareholders of the Funds. Consequently, Clients with such Funds in their accounts are effectively paying the third-party investment adviser of the Funds for the management of their Funds’ assets. Hence, all fees paid to third-party investment advisers of the Funds for investment advisory services are separate and distinct from the fees charged by ASC. **The total fees charged by both ASC and third-party investment advisers will not exceed 3% of the assets under management per year.**

Fee Schedule

1. The Adviser’s annual fee for investment management services provided under this Agreement shall be a percentage (%) of the net value of the Assets under management in accordance with the fee schedule set forth in **Section 2** (below) of this **Fee Schedule**.
2. Client shall pay the Advisor the asset allocation fee set forth in this **Fee Schedule** (“Allocation Fee”).
3. **Investment Supervisory Services Fee Schedule.** The Advisor shall receive an annualized Allocation Fee on each account. The Allocation Fee shall be calculated based on the following fee schedule:

Account Value	Annualized Asset Allocation Fee	Quarterly Asset Allocation Fee	Non-Retirement Account Set-up Fee	Retirement or Trust Account Set-up Fee
\$250,000 or Less	2.00%	0.5000%	\$250	\$2,000
\$250,001 - \$499,999	1.75%	0.4375%	\$500	\$2,000
\$500,000 - \$749,999	1.50%	0.3750%	\$750	\$2,000
\$750,000 - \$999,999	1.25%	0.3125%	\$1,000	\$2,000
\$1,000,000 - \$2,499,999	1.10%	0.2750%	\$1,500	\$2,000
\$2,500,000 - \$4,999,999	1.05%	0.2625%	\$2,000	\$2,000
\$5,000,000 or More	1.00%	0.2500%	\$2,000	\$2,000

4. **Investment Supervisory Services Flat Rate Fee.** The Allocation Fee shall be billed at a flat rate. For example, if the Account value is \$500,001, then the entire Account will be billed at 1.50%.
5. **Set-up Fee.** The setup fee for a retirement account is \$2,000 and for a non-retirement account varies from \$250 to \$2,000 depending on the total assets under management. This set-up fee helps to cover the initial analysis for Client’s financial circumstances and producing Client’s Investment Objectives and asset allocation. This set-up fee is due to be paid at the time of signing of this investment advisory Agreement.
6. **Investment Supervisory (Portfolio Management for Individuals and/or Small Businesses) Asset Allocation Fee Calculation.** The Allocation Fee will be calculated and paid to the Advisor each calendar quarter in arrears. Partial periods shall be prorated. The Allocation Fee calculation will use the value of the account at the end of the quarter (or the end of the applicable period, if prorated). For example, the Allocation Fee for the first quarter (Winter) will be calculated and deducted from the account during the month of April, based on the value of the account at the end of March.
7. **Value of the Assets.** For purposes of this Fee Schedule, the value of the assets under management will be the sum of the fair market value of all assets, including cash and accrued interest, in the Client’s account. Equity securities listed or traded on a national securities exchange or quoted on the over-the-counter market are valued at the last sales price on the day of valuation or, if no sale price is reported, at the last bid price. Other assets and securities for which market quotations are not readily available are valued at fair market value as determined in good faith by the Advisor.

B. Fee Billing

Investment Supervisory Services - Portfolio Management for Individuals and/or Small Businesses

Investment Supervisory fees will be automatically deducted from the Client's account by the custodian. The Advisor will send an invoice to the custodian indicating the amount of the fees to be deducted from the Client's account at each calendar quarter-end date. The amount due is calculated by applying the quarterly rate (which is the annual rate divided by 4) to the total assets under management with ASC for each account at the end of each quarter. Clients will be provided with a statement, at least quarterly, from the custodian reflecting deduction of the Investment Supervisory fees. In addition, the Advisor will provide the Client a report itemizing the fee, including the calculation period covered by the fee, the account value and the approach used to calculate the fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the custodian's brokerage statement as the custodian does not assume this responsibility. Clients will provide written authorization permitting ASC to be paid directly from their accounts held by the custodian as part of the investment advisory agreement and separate account forms provided by the custodian.

Portfolio Management Services - Portfolio Management for Individuals and/or Small Businesses

Portfolio Management fees will be directly billed to the Client, and the Client will pay the invoices upon receipt. The advisor will email the invoice directly to the Client as a PDF file attachment. On rare occasions depending on unforeseen circumstances, the Advisor will send the said invoice via First class U.S. Mail or facsimile. The Client's invoice is due and payable upon receipt.

Termination

Investment Supervisory Services - Portfolio Management for Individuals and/or Small Businesses

Either party may terminate the agreement upon thirty (30) days' written notice to the other party. The Client will receive a prorated refund of any fees paid in advance based on the effective date of termination.

Portfolio Management Services - Portfolio Management for Individuals and/or Small Businesses

ASC considers the Portfolio Management Services to be complete, and the agreement terminated, upon delivery of the agreed services. In the event either the Client or the Advisor wishes to terminate the agreement before completion of the services, either party may terminate the agreement at any time by providing written notice to the other party. The Client may terminate the agreement at any time by writing to ASC at our office. Upon notice of termination, ASC will provide the Client with an invoice for services provided through the date of termination.

C. Other Compensation

Please see disclosures under **Item 10 – Other Financial Industry Activities and Affiliations** below.

ITEM 6 - PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

ASC does not charge performance-based fees or other fees for its Investment Supervisory Services based on a share of capital gains on or capital appreciation of the cash or securities held by any Client. The fees charged by ASC are as described in Item 5 – Fees and Compensation.

ASC does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

ITEM 7 - TYPES OF CLIENTS

ASC offers Investment Supervisory Services and Portfolio Management Services to individuals (other than high net worth individuals), high net worth individuals, trusts, estates, individual participants of retirement plans, corporations and other businesses, pension and profit-sharing plans, and charitable organizations in California. ASC does not offer Investment Supervisory Services to other states.

The relative percentage of each type of Client is available on ASC's Form ADV Part 1. These percentages will change over time. ASC generally does not impose a minimum account size for establishing an Investment Supervisory relationship.

ITEM 8 - METHODS OF ANALYSIS, INVESTMENT STRATEGIES, AND RISK OF LOSS

A. Methods of Analysis

Fundamental Analysis

We use fundamental analysis to evaluate a security's intrinsic value by examining related economic and financial factors to understand if a security's current price is undervalued or overvalued. Depending on the stock market's and economic conditions, it may be advisable to sell an overvalued-security and purchase an undervalued-security.

Quantitative Analysis

The Advisor uses mathematical and statistical modeling to analyze investment opportunities such as when to purchase or sell securities. The Advisor performs quantitative analysis for investment decision-making process from the examination of simple statistical data like a company's revenue to complex calculations.

Qualitative Analysis

We use subjective analysis based on non-quantifiable factors such as a company's management expertise, industry cycles, and strength of research and development. Qualitative analysis is used to examine a company's operations and evaluate its potential as an investment opportunity.

B. Investment Strategies

ASC generally employs a long-term investment strategy for its Clients which is to be consistent with their financial goals. The Advisor will typically hold all or a portion of a security for more than a year, but the Advisor may hold the securities in the portfolio for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, the Advisor may also buy and sell positions that are more short-term in nature depending on the goals of the Client and/or the fundamentals of the security, sector, asset class, or the current or upcoming United States and global economic conditions.

ASC's general investment strategy is to seek real capital growth proportionate with the level of risk the Client is willing to take. Each Client's portfolio is treated uniquely. ASC meets with Clients to understand

their investment objectives and financial status. We assist and advise the Client to determine the Asset allocation based on their investment objectives. We provide ongoing monitoring.

C. Investing Involves Risk

Investing in securities involves risk of loss, and Clients should be prepared to bear that risk. Past performance does not guarantee future returns. Like any investment strategy, investing in stocks, bonds, mutual funds, and ETFs involves material risks. Such material risks are described in further detail below.

Investing for the long term means that Client's account will be exposed to short-term fluctuations in the market and the behavioral impulse to make trading decisions based on such short-term market fluctuations. ASC does not condone short-term trading to "time" the market and instead encourages the Clients to remain committed to their financial goals. However, investing for the long term can expose Clients to risks borne out of changes to interest rates, inflation, general economic conditions, market cycles, geopolitical changes, and regulatory changes.

Investing in Funds does not guarantee a return on investment, and the shareholders of such Funds may lose the principal that they have invested in such Funds. Mutual funds and many Exchange-Traded funds invest into their underlying securities that comprise the fund; and the Clients are inherently exposed to the risks arising from their underlying securities. These Funds charge internal expenses to their shareholders, and these internal expenses reduce the Fund's potential for market appreciation. Shares of mutual funds may only be traded at their stated net asset value ("NAV") which is calculated at the end of each day upon the market's close. Clients are encouraged to carefully read the prospectus of any of these Funds before they are purchased for investment and gain a full understanding of the Fund's risks and costs. Most if not all mutual funds and ETFs have a charge called expense ratio which represents all of the management fees and operating costs of the fund. Many if not all mutual funds have other charges which can include administration fees, shareholder servicing fees, sales loads, redemption fees, or other fund fees and expenses.

ITEM 9 - DISCIPLINARY INFORMATION

ASC and our personnel seek to maintain the highest level of business professionalism, integrity, and ethics. ASC does not have any disciplinary information to disclose.

ITEM 10 - OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Benjamin Yashar is a software and database programmer, and he is currently employed by DGA-PPHP. In his employment capacity at DGA-PPHP, Benjamin Yashar works ten hours per day from Tuesday to Friday of each week, and he devotes Saturdays and Mondays, and sometimes Sundays, to ASC's activities. ASC may engage in custom-made software and database design and development for its non-advisory clients on a consulting basis. ASC's primary revenue may come from computer consulting services. ASC's revenue also comes from the dividends the company receives from its security investments. Benjamin Yashar will spend less than 72% of his time providing computer programming services as an employee of DGA-PPHP and/or as an independent contractor.

While ASC endeavors always to put the interests of its Investment Supervisory Clients first as part of their fiduciary duty, Clients should be aware that the computer consulting business could create a conflict of interest between the time spent on Investment Supervisory Services and the computer consulting business.

Once ASC's revenue from investment advisory services reaches a certain level which will be adequate to pay all of ASC's company expenses, ASC will abandon the computer consulting business for good.

Neither ASC nor any of its managers and officers are registered or have an application pending to register as a broker-dealer or a registered representative of a broker-dealer. Neither ASC nor any of its management persons are registered, or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities. None of the owners nor any member of the management team is registered with a futures commission merchant, commodity pool operator, a commodity trading advisor as a registered representative.

Neither ASC nor any of its managers and officers have any material relationship or arrangement with any municipal securities dealer, investment company, pooled investment vehicle, mutual fund, closed-end investment company, unit investment trust, private investment company, hedge fund, offshore fund, futures commission merchant, commodity-pool operator, commodity trading adviser, pension consultant, and sponsor or syndicator of limited partnerships.

As stated in Item 4.B above, the Firm may, on occasion, recommend that all or a portion of the assets in the account be managed by an outside registered investment advisor, outside money manager, or a sub-Advisor ("Sub-Advisor"). **The Firm will not be compensated directly or indirectly from those Sub-Advisors.** Any direct or indirect compensation from a Sub-Advisor to the Firm can create conflict of interest, for example, it would provide the Firm the opportunity to profit from hiring the services of a Sub-Advisor in addition to the Allocation Fee paid by the Client. Because the Firm **will not be compensated** directly or indirectly from those Sub-Advisors, any conflict of interest which may arise from hiring and utilizing the services of Sub-Advisors is minimized.

Prior to recommending and selecting any sub-advisor, the Firm will confirm that the sub-advisor is properly licensed or reported, and the sub-advisor is registered as an investment adviser.

ITEM 11 - CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

ASC has adopted a Code of Ethics that will be provided to any advisory or prospective Client upon request. You may request a copy by email sent to AltmanSacks@gmail.com or by calling us at (310) 678-6021. ASC's Code of Ethics describes the guidelines for professional standards of business conduct that ASC requires of its supervised persons, access persons, managers, officers, employees, and others identified by our Chief Compliance Officer (collectively referred to as "Key Personnel"), which is reflective of ASC's fiduciary obligations to act in the best interests of our Clients and place the interests of our Clients first ahead of personal interests. ASC's Clients can decline to have us implement any advice that is rendered to our Clients except in situations where our Firm has been granted discretionary authority. Our Code of Ethics, (1) Includes sections related to compliance with federal and state securities laws which govern its investment advisory business, (2) Requires Key Personnel to act with honesty, good faith, and fair dealing in working with Clients, (3) Prohibits Key Personnel from trading or otherwise acting on insider information, (4) Sets forth policies and procedures to monitor and report personal securities transactions and holdings of Key Personnel, (5) Mandates to report violations of Code of Ethics to ASC's Chief Compliance Officer, (6) Requires pre-approval of certain investments by Key Personnel, and (7) Includes the distribution of Code of Ethics and any amendments to all Key Personnel followed by a written acknowledgement of their receipt.

Neither ASC nor any of its Key Personnel recommends securities to Clients, or buys or sells securities for Client's accounts, in which ASC or any of its Key Personnel has a material financial interest. From time to time, ASC or its Key Personnel will invest in the same securities (or related derivative securities such as warrants, options, or futures) that ASC or a Key Personnel recommends to Clients. This has the potential to create a conflict of interest because it affords Adviser or its Key Personnel the opportunity to profit from the investment recommendations made to Clients. ASC's policies, procedures, and Code of Ethics address this potential conflict of interest by, (1) Prohibiting such trading by ASC or its Key Personnel if it would be to the detriment of any Client, and (2) By monitoring for compliance through the reporting and review of quarterly personal securities transactions' reports and initial and annual securities holdings reports which must be submitted by the firm's Key Personnel. In all instances, ASC will act in the best interests of its clients.

From time to time, ASC or its Key Personnel will buy or sell securities for Client's accounts at or about the same time that the Adviser or a Key Personnel buys or sells the same securities for ASC's or Key Personnel's own account. This has the potential to create a conflict of interest because it allows ASC or its Key Personnel the opportunity to trade either before or after the trade is made in the Client's accounts, and profit as a result. ASC's policies, procedures, and Code of Ethics address this potential conflict of interest by prohibiting such trading by ASC or its Key Personnel if it would be to the detriment of any Client and by monitoring for compliance through the reporting and review of personal securities transactions. In all instances, ASC will act in the best interests of its Clients.

ASC's Code of Ethics includes the Firm's policy which prohibits the use of material non-public ("Insider") information. As we do not believe that ASC's Key Personnel have any access to Insider information, all ASC employees are warned that such information may not be used in a personal or professional capacity. ASC's Code of Ethics defines policies and procedures to monitor and review the personal trading activities of Key Personnel. ASC's Key Personnel may buy, sell, or invest in the same securities recommended to Clients for their personal accounts or may invest in different securities from those recommended to our Clients. ASC's Code of Ethics for Key Personnel's personal trading policies include procedures for limitations on their personal securities' transactions, reporting, and review of such trading transactions, and pre-clearance of certain types of personal trading activities which is to discourage and prohibit personal trading transactions which would be to the detriment of any Client. ASC's Code of Ethics provides for disciplinary action as appropriate for violations.

ASC and ASC's Key Personnel are prohibited from (1) engaging in principal transactions, or (2) engaging in agency cross transactions. ASC and ASC's Key Personnel must follow our procedures when purchasing or selling the same securities purchased or sold for Clients. ASC's Key Personnel are prohibited from buying or selling any security prior to same transactions being executed for an advisory account. This prevents profiting from the transactions placed on behalf of advisory accounts.

ITEM 12 - BROKERAGE PRACTICES

ASC does not maintain custody of Client's assets, although we may be deemed to have custody of your assets if you give us authority to withdraw or debit advisory fees from your account as described in Item 15 –Custody. Client's assets must be maintained in an account at a "qualified custodian," which is generally a broker-dealer or bank.

ASC is independently owned and operated, and ASC is not affiliated with the custodians. The custodians will hold Client's assets in a separate brokerage account and, the custodians will buy and sell securities

when ASC and/or the Client instructs them to do so. While ASC recommends the custodians to Clients by entering into an account agreement directly with them, ASC does not open the account for the Client although the Firm may assist the Client in doing so.

ASC does not take into consideration whether ASC or any Key Personnel would receive client referrals from a custodian for the custodian selection or recommendation we make to our advisory or prospective clients.

ASC recommends a brokerage firm as custodian which will hold Client's assets and execute transactions based on, (1) the ability to expedite timely transfers and payments to and from Client's accounts, (2) the availability of investment research and tools that assist us in making investment decisions, (3) the quality of their services, (3) the competitiveness of the price of those services, and (4) their reputation, reliability, financial strength, and corporate stability.

Custodian recommendation and selection will be based on one or more of the following entities to serve as the Custodian(s) that will hold the Client's assets under management:

- ☐ Fidelity Investments ("Fidelity"); or
- ☐ Charles Schwab & Co., Inc. ("Schwab"); or
- ☐ Other Broker/Dealer

The Custodian recommendation and selection will not be based on the intention to receive client referrals from a broker-dealer or third party for the Advisor or a related person. Hence, the Advisor will not consider selecting or recommending broker-dealers for the benefit of ASC or a related-person to receive client referrals from a broker-dealer or third party.

ASC is independently operated and owned and has no affiliations or relationship with any broker-dealer, investment advisor, or any other financial organization, and there will be no conflict of interest in custodian recommendation and selection. ASC's practice and policy for the selection of the broker-dealer for the Client's account is solely based on factors that seem to be to the best interest of the Client as they are listed above.

ASC does not routinely recommend, request, or require that a client directs ASC to execute transactions through a specified broker-dealer. Not all advisors require their clients to direct brokerage. By directing ASC to execute transactions through a specified broker-dealer, the Client may be unable to achieve most favorable execution of client transactions, and this practice may cost the Client more money.

ASC permits a Client to direct brokerage. Because the account held at a brokerage firm is an asset of the Client, the practice of client-directed brokerage does not violate any of the Advisor's duty. In a client-directed brokerage arrangement, the Advisor should disclose to the Client its duty to continue to seek to obtain best execution, and whether this may affect the Advisor's ability to seek to obtain best execution. However, the Advisor may be unable to achieve most favorable execution of client transactions.

Directed brokerage defines arrangements where the Client requests or requires that the Adviser use a certain brokerage firm. Directed brokerage may cost clients more money. For example, in a directed brokerage account, the Client may pay higher brokerage commissions because the Client may receive less favorable prices. The Adviser may suggest that trades be executed through certain other brokerage firms than those requested or required by the Client. This practice may present clear and obvious conflicts of interest which

must be disclosed and discussed with the Client. The Client directed brokerage does not necessarily present a risk to achieving best execution.

Our policy is to recommend larger brokerage firms such as Fidelity and Charles Schwab because of their level of company assets to have a business relationship with them and hold Client's assets in their custody. We believe that larger brokerage firms in terms of their assets tend to be safer for holding the Client's assets in their custody than the smaller brokerage firms with less assets.

ASC does not aggregate the purchase or sale of securities for various client accounts. Our practice is to place separate purchase and sale transactions for each Client's account. This may increase the Client's cost of transactions. However, Fidelity and Charles Schwab provide zero transaction costs for placing equity transactions.

The custodians charge separate fees directly to Clients which may include fees for custody, brokerage, platform, trading, and/or sub-advisory services provided by the custodians. ASC seeks best-execution for Client's trades where best-execution means the most favorable terms for a transaction based on all relevant factors.

The custodians' services that may not directly benefit the Client may include products and services which support ASC in managing and administering Clients' accounts, such as software and technology which, (1) may facilitate us with back-office functions, recordkeeping, and reporting of Client's accounts, (2) provide access to the Client's account data like account statements, and (3) provide pricing and other market data.

The custodians may offer certain services which may benefit ASC such as online seminars on technology and business needs as well as access to certain publications and conferences on practice management and business development.

The availability of these services from custodians is advantages to ASC as these services are provided for free, and hence ASC does not need to produce or purchase said services. A potential conflict of interest may arise when ASC may have a motivation to recommend to Clients to establish their accounts with custodians based on ASC's interest in getting custodian's services which benefit our business over Client's interest in receiving the best custodian services and the most favorable execution of Client's transactions. However, ASC believes that our selection of custodians is in the best interests of Clients. ASC's custodian selection is primarily backed by the extent, quality, and price of custodian's services, and it is not based on custodian's services that benefit only ASC or those services which may not directly benefit Clients.

Commissions and other fees for transactions executed through the selected custodian may be higher than commissions and other fees available if the Clients use another custodian to execute transactions and maintain custody of Client's accounts. However, we consider that the overall level of services and support provided to our Clients by such custodians outweighs the benefit of possibly lower transactions cost which may be available under other brokerage arrangements.

ASC has reasonably disclosed all material conflicts of interest in this Part 2A of Form ADV.

ITEM 13 - REVIEW OF ACCOUNTS

Investment Supervisory Account Reviews

The Client's securities are continually monitored, and the Client's accounts are reviewed at least monthly with respect to the Client's Investment Objectives. These accounts are reviewed by Benjamin Yashar. Factors that may trigger a review may include a change in the Client's Investment Objectives, financial circumstances, material developments in market conditions, material geopolitical events, and changes to a Client's personal or financial situation.

Investment Supervisory Account Reporting

Clients receive written monthly or at least quarterly statements and trade confirmations from custodians. The written monthly or quarterly statements include accounting of all holdings and transactions in the account for the reported month. Third-party investment advisers who manage Client's accounts, if any, may provide additional reports to Clients. ASC provides annual reports which summarize account performance, balances, and cash and security holdings in the account.

Portfolio Management Account Reviews

The Client's securities are periodically monitored, and the Client's accounts are reviewed with the Client on as needed basis. Accounts are reviewed with respect to the Client's Investment Objectives. These accounts are reviewed by Benjamin Yashar. Factors that may trigger a review may include a change in the Client's Investment Objectives, financial circumstances, material developments in market and economic conditions, material geopolitical events, and changes to a Client's personal or financial situation.

Portfolio Management Account Reporting

Portfolio Management Services' Clients receive written monthly or at least quarterly statements and trade confirmations from custodians. The written monthly statements include accounting of all holdings and transactions in the account for the reported month or quarter. ASC provides annual reports which summarize account performance, balances, and cash and security holdings in the account.

ITEM 14 - CLIENT REFERRALS AND OTHER COMPENSATION

Professional Referrals

From time to time, ASC refers Clients to unaffiliated professionals for a variety of services such as attorneys, mortgage brokers, insurance brokers, agents, managers, and financial planners solely for the benefits for the Clients. In turn, these professionals may refer clients to ASC. ASC does not receive any monetary or non-monetary compensation for referring our Clients to such professionals, and we will never share information with an unaffiliated provider unless first authorized by the Client. Clients are under no obligation to purchase any products or services through these professionals, and ASC has no control over the services provided by them. Clients who choose to engage these professionals for their products and services will sign a separate agreement with them. Fees charged by such other organizations are separate from and in addition to fees charged by ASC.

ASC does not hire solicitors and won't pay anyone for referring potential clients to us. No one at ASC is permitted to accept any form of compensation such as cash, rewards, or other incentives from a non-client with respect to the advisory services we provide to our clients.

ITEM 15 - CUSTODY

An independent qualified custodian (generally a broker-dealer, bank, trust company, or other financial institution) holds each client's Assets, and ASC does not act as custodian for any client. These accounts are maintained in the name of the client.

At no time will ASC accept or maintain custody of a Client's cash or securities, except for authorized withdrawal and deduction of the advisory fees from your account. Investment Supervisory fees will be automatically deducted from the Client's account by the custodian. Clients will provide written authorization permitting ASC to be paid directly from their accounts held by the custodian as part of the investment advisory agreement and separate account forms provided by the custodian. The Advisor will send an invoice to the custodian indicating the amount of the fees to be deducted from the Client's account at each calendar quarter end date.

At least quarterly, the custodian is required to send account statements directly to the Client which, (1) reflects the deduction of the Investment Supervisory fees, (2) a list of all assets held in the account and asset values, (3) all transactions affecting the account assets, including any additions or withdrawals, and (4) shows all transactions within the Client's account for the reported period. The Client should carefully review those statements promptly. It is the responsibility of the Client to verify the accuracy of these fees as listed on the custodian's brokerage statement as the custodian does not assume this responsibility.

ITEM 16 - INVESTMENT DISCRETION

Only for Clients who grant discretionary authority over the management of their accounts to us, we place buy and sell trades in the Client's account without contacting the client prior to each transaction to acquire the Client's permission. Based on the securities laws, ASC has investment discretion if it has the authority to decide which securities and how many of the same securities to purchase or sell for the Client's account without contacting the Client. Clients give us discretionary authority when they sign a discretionary agreement with our Firm, and the Clients may reduce this discretionary authority by giving us written directions. Clients may also change such discretionary authority in writing (email notice will not suffice).

ITEM 17 - VOTING CLIENT SECURITIES

Proxy Voting

ASC does not accept proxy-voting for any Client. ASC will not be deemed to have proxy-voting authority solely as a result of providing advice or information about a specific proxy-vote to a Client. However, the Client retains the sole responsibility for proxy decisions and voting. Clients will receive their proxies or other solicitations directly from their custodian or a transfer agent.

ITEM 18 - FINANCIAL INFORMATION

Registered investment advisers are required in this item to provide clients with certain financial information or disclosures about the Firm's financial condition. ASC has no condition that is reasonably likely to impair its ability to meet contractual obligations to its Clients. In August 2012, Benjamin Yashar declared personal bankruptcy in the United States Bankruptcy Court of the Central District of California. ASC is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect fees of \$500 for services to be performed six months or more in advance.

ITEM 19 - REQUIREMENTS FOR STATE-REGISTERED ADVISERS

A. Background of Principal Officer

The President of ASC is Benjamin Yashar. Mr. Yashar, born in 1960, is dedicated to the investment advisory accounts of ASC. Mr. Yashar earned a B.S. in Computer Engineering from University of California, Los Angeles in 1986, an M.A. in Counseling Psychology from Ryokan College in 1998, a certificate in General Business Studies with Concentration in Real Estate from UCLA Extension in 2003, a Paralegal Certificate approved by the American Bar Association from the University of La Verne in 2011.

Employment History:

President, Altman Sacks Corporation, June 2015 to Present. Altman Sacks Corporation filed for investment advisory registration with California in September of 2019. ASC has engaged in the business of providing computer programming services on consulting basis since its inception in June 2015.

President, Executive Computer Consulting Corporation, February 1992 to December 2015.

Securities Examinations

Series 65 - the Uniform Investment Adviser Law Examination

B. Other Business Activities of Principle Officer

ASC and our personnel engage in other business activities besides providing investment advice. We discuss these activities under Item 10 - Other Financial Industry Activities and Affiliations, above.

C. Performance-Based Fees

ASC does not charge performance-based fees or other fees based on a share of capital gains or on capital appreciation of the assets of a client for its investment advisory services. The fees charged by ASC are as described in Item 5 – Fees and Compensation above and are not based upon the capital appreciation of the funds or securities held by any Client.

D. Legal and Disciplinary Issues

There are no legal, civil, or disciplinary events to disclose regarding ASC or any of its personnel. ASC and our personnel seek to maintain the highest level of business professionalism, integrity, and ethics. Neither ASC nor any of its personnel have any legal or disciplinary items to disclose. There have been no client complaints, lawsuits, arbitration claims, or administrative proceedings against ASC or any of its personnel.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil, or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. **As previously noted, there are no legal, civil or disciplinary events to disclose regarding ASC or any of its personnel.**

E. Arrangements with Securities Issuers

Neither ASC nor any of our personnel have any relationships or arrangements with issuers of securities.

F. Business Continuity Plan Notice

ASC has a Business Continuity Plan (“**BCP**”) in place that provides detailed steps to mitigate and recover from the loss of office space, communications, services, or key people. **ASC will maintain a written BCP.**

Disasters - The **BCP** covers natural disasters in California such as storms, earthquakes, and flooding. The **BCP** covers man-made disasters such as loss of electrical power, fire, communications line and Internet outages.

Alternate Offices - Alternate offices are identified to support ongoing operations in the event the main office is unavailable. It is our intention to contact all clients within five days of a disaster that dictates moving our office to an alternate location.

Loss of Key Personnel - ASC is operated as a corporation with Benjamin B. Yashar as the President and CCO. As the sole employee, the business depends fully on his capabilities. In the case of his disability, steps will be taken to determine if the business will continue and in what capacity. In the case of his death, there is no plan for continuation of the business, and the business must be dissolved. At that time, clients will be notified.