

SWISS ASSET ADVISORS AG

BROCHURE: PART 2 OF FORM ADV

1. SWISS ASSET ADVISORS AG

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This brochure provides information about the qualifications and business practices of SAA AG. If you have any questions about the contents of this brochure, please contact us at +41-41-726-4334 and or mblank@swissassetadvisors.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 SAA is also available on the SEC's website at www.adviserinfo.sec.gov.

2. THERE ARE NO MATERIAL CHANGES FROM THE LAST ANNUAL UPDATE

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4. ADVISORY BUSINESS:

a) SAA AG has been in business since July, 2008. The principal owner is Swiss Asset Advisors (CYPRUS) Ltd. SAA AG is a wealth management firm and multi-family office which provides tailor-made financial solutions for its clientele. SAA AG provides comprehensive investment services to its select group of clients which include direct investments in stocks, bonds, currencies and commodities with global diversification.

b) The investment advisory services are listed as follows:

Portfolio Management:

- Global Diversified Investment Strategies

- Multi-Currency Asset Allocation Models
- Domestic Investment Strategies
- Portfolio Monitoring and Risk Management
- Quarterly Performance Review
- Annual Portfolio Evaluation

Investment Advisory:

- Active Consulting for your Individual Investment Objectives
- Customized Structured Products
- Multi-Layer Currency Strategy
- Commodities
- Access to Global Research
- Trading:
 - Global Securities
 - Derivatives (Options and Futures)
 - Precious Metals
 - Currencies

Alternative Investment Advice:

- Hedge Funds
- Real Estate
- Private Equity
- Structured Products

Lending Services:

- Lombard Facilities at LIBOR Based Rates
- Letters of Credit

Securities Administration

- Offshore and On-Shore Custody of Assets

c) SAA tailors its advisory services to the individual needs of its clients. Clients may impose restrictions on investing in certain types of securities.

d) SAA does not participate in wrap free programs. SAA AG manages approximately 250m USD as of December 31st, 2012.

Discretionary assets: 187, 500,000 USD

Non-discretionary assets: 62,500,000 USD

5.FEES AND COMPENSATION:

Discretionary Management Fees*			
Portfolio Tranche	Fixed Income Mandate	Mixed Mandate	Equity Mandate
First \$2 million	0.80%	1.30%	1.80%
Next \$3 million	0.70%	1.20%	1.60%
Next \$5 million	0.60%	1.10%	1.40%
Next \$15 million	0.50%	1.00%	1.20%
\$25 million and above	Available upon request		

*Discretionary Management Fees are calculated on a tranche basis.

Please refer to your Custodian's fee schedule for safekeeping fees, administration fees and ticket fees.

Advisory Fees	
Advisory Service	1.00% to 2.00%

Custody/Cash Management Fees	
Custody/Cash Management Service	0.50%

Please refer to your Custodian's fee schedule for safekeeping fees, administration fees and trading commission schedule.

Swiss Asset Advisors minimum quarterly charge: \$500

- a) Fees are negotiable based on asset size and mandate.
- b) Fees are billed on a quarterly basis in advance and deducted by the custodial bank.
- c) There are no other fees or expenses charged by SAA. Clients will incur bank charges for brokerage and/or custody which will be debited by the bank. All bank charges are disclosed to the client in written form.
- d) Clients of SAA are invoiced quarterly in advance. If the advisory contract is terminated before the end of the billing period, the client may receive a refund subject to any costs or expenses.
- e) SAA invests in direct securities: stock, bonds, currencies, commodities. SAA does not sell mutual funds or third party manager's products such as private equity. SAA does not receive any trading commissions.

6.PERFORMANCE BASED FEES:

SAA does not participate in any performance based fees.

7.TYPES OF CLIENTS:

Client Profile: US and Non-US clients. Minimum account size 1 million USD. Accounts can be opened under any structure in the US and Offshore.

8.METHODS OF ANALYSIS, INVESTMENT STRATEGIES + RISK OF LOSS:

a) SAA uses the top down and bottom up fundamental analysis approach with a globally diversified investment philosophy. As part of SAA's due diligence process, clients together with the advisor discuss and prepare a detailed risk profile which is used to define the appropriate investment strategy. Investing in securities involves risk of loss that clients should be prepared to bear.

b) SAA's strategy always analyzes the following risk components:

- Economic Risk
- Interest Rate Risk
- Liquidity
- Credit Quality
- Country Risk
- Corporate Risk
- Currency Risk
- Management Risk
- Market Risk

The method of analysis applied is industry standard and does not involve significant or unusual risk. SAA is not involved in frequent trading activity. Our investment strategies aim for mid to long term returns.

c) SAA does not recommend primarily a particular type of security. SAA employs a diversified investment approach.

9.DISCIPLINARY INFORMATION:

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of SAA's advisory business or the integrity of its management.

a)Not applicable

b)Not applicable

c)Not applicable

10.OTHER FINANCIAL INDUSTRY ACTIVITIES & AFFILIATIONS:

a) Not applicable

b) Not applicable

c)

1) None

2) None

3) None

4) None

5) None

6) None

- 7) None
- 8) None
- 9) None
- 10) None
- 11) None

d) SAA does not recommend or select other investment advisors or third party managers.

11.CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING:

- a) SAA conforms to the code of ethics for investment advisors pursuant to SEC rule 204A-1. SAA will provide a copy of our code of ethics to any client or prospective client upon request.
- b) SAA has no material financial interest in any recommended security.
- c) SAA does not invest in the same securities as clients.
- d) SAA may buy for its principals account securities purchased for the clients only after the clients purchase is concluded.

12.BROKERAGE PRACTICES:

- a) SAA does not recommend any broker-dealers.
 - SAA receives no “soft dollar” benefits
 - SAA receives no fees from broker-dealers
 - SAA has no directed brokerage

13.REVIEW OF ACCOUNTS:

- a) SAA reviews all discretionary + advisory accounts on a quarterly basis. The nature is to discuss with the client and realign their investment strategy. The individuals involved are: CIO, Senior Relationship Manager and Managing Director.
- b) Exceptional Market Conditions
- c) Weekly written market report: containing global economic analysis and commentaries.

14.CLIENT REFERRALS + OTHER COMPENSATION:

- a) SAA has no arrangements with unrelated persons
- b) SAA has no compensation program for unrelated persons.

15.CUSTODY:

SAA does not custody client funds or securities. A qualified custodian sends account statements directly to the clients. Clients should carefully review those statements. Clients also have access to their portfolios at the custodian's secure internet site. SAA does not produce account statements.

16.INVESTMENT DISCRETION:

SAA accepts discretionary authority to manage securities accounts on behalf of clients.

17.VOTING CLIENT SECURITIES:

- a) SAA has no authority to vote client securities
- b) SAA has no authority to vote client securities. Clients will receive their proxies + other solicitations directly from the custodian. Clients can contact SAA directly with any questions regarding a particular solicitation.

18. FINANCIAL INFORMATION:

- a) SAA does not require or solicit prepayment of any fees six months or more in advance.
- b) SAA does not require or solicit prepayment of any fees six months or more in advance.
- c) SAA has never been the subject of a bankruptcy petition at any time.

19.REQUIREMENTS FOR STATE-REGISTERED ADVISORS :

- a) Michael A. Blank, Managing Director. Founder of Swiss Asset Advisors. He has been an International Private Banker for the past 23 years, during which time he established Bank Julius Baer in Palm Beach and Credit Suisse Private Advisors in Miami. In addition, Michael has over 13 years of experience in practicing international law, specializing in pre-immigration planning for high net worth individuals. He remains active in assisting private clients, corporations and

institutions with wealth preservation planning. Michael is a member of the Florida Bar, Society of Trust and Estate professionals (STEP), International Tax Planning Association (ITPA) and Florida International Bankers Association (FIBA). He has also served as a contributing editor to Offshore Investment, a monthly professional journal. With his financial and legal expertise, Michael truly brings a unique perspective to Swiss Asset Advisors.

Giuseppe Mazzeo, Chief Investment Officer. St. Moritz native Giuseppe Mazzeo “Pepe” brings over 25 years of investment strategy during his career at Credit Suisse. At which time, he headed the global Investment Strategy team with assets over 40 billion Swiss Francs. As a proven expert in risk management quantitative analysis and optimization of asset allocation, Pepe brings the highest level of knowledge and experience to our team. He is fluent in English, Spanish, German, Swiss German, Italian and French. As a result, Pepe has a unique understanding of the various global financial markets.

- b) None
- c) SAA receives no performance-based fees.
- d) No Management person has been involved in any of the events in items 1 or 2.
- e) SAA + its management have no relationship with any issuer of securities.