



Finaport Americas Investment Advisers, LLC
600 Brickell Avenue
Suite 1530
Miami, Florida 33131
Tel 786.228.8757

This brochure was last updated on October 11, 2013

This brochure provides information about the qualifications and business practices of Finaport Americas Investment Advisers, LLC (“Finaport Americas”). If you have any questions about the contents of this brochure, please contact us at the telephone number listed above or by email at Scott.Hartzell@finaportamericas.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. Finaport Americas is registered with the SEC as an investment adviser; however, such registration does not imply a certain level of skill or training.

Additional information about Finaport Americas is available on the SEC’s website at www.adviserinfo.sec.gov.

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* A NOTE ABOUT THE FORMAT OF THIS BROCHURE: The SEC requires all registered investment advisers to use prescribed headings, even if those headings are not relevant to a particular adviser's operations. Where a required heading does not pertain to our business, we list the heading and explain that the topic does not apply to us.

A. ADVISORY BUSINESS

1. Background

Finaport Americas Investment Advisers, LLC (“Finaport Americas” or the “Firm”) was formed in April 2013 to provide investment management services to certain high net worth individuals, their families and their representatives (*e.g.*, family offices), as well as certain institutional clients. Finaport Americas’ principal place of business is located in Miami, Florida.

Finaport Americas is wholly owned by Finaport Americas, Inc., a Florida corporation. Finaport Americas, Inc. is wholly owned by Finaport Holding Ltd of Zurich, Switzerland, the principal owners of which are Hellmut Schüemperli and Alex Borissov.

2. Services Provided

Finaport Americas provides discretionary asset allocation and management services to its clients. The Firm also provides advice and support in a broad range of other financial matters, including the selection of custodians, financial planning, and liquidity analysis. Finaport Americas makes discretionary investments in, and provides other advice relating to, a variety of securities, including but not limited to equities (U.S., Global, International), fixed income (U.S., European, and Emerging Markets), options, notes, exchange-traded funds, hedge funds, and private equity investments. Please see Section M for additional information relating to Finaport Americas’ discretionary investment management practices.

Finaport Americas may also refer third-party investment managers to clients through the Fiduciary Adviser Advocates Manager Program (“FAA Program”).

The Firm tailors its investment advice and wealth solutions for each of its clients based on, among other factors, each client’s risk profile, income and liquidity needs, and investment objectives. When the Firm provides asset allocation and management services to clients, it typically does so through the exercise of discretionary investment authority. In such arrangements the Firm typically selects the securities and types of securities in which the client invests without consultation with the client. Similarly, when client assets are managed by a third-party investment manager the Firm has recommended, typically such investment manager will select the securities and types of securities in which the client invests pursuant to a separate investment management agreement granting discretionary investment authority and without consultation with the client. Clients generally maintain full access to their accounts and may impose restrictions on the discretionary investment authority that is exercised on their behalf.

Since Finaport Americas is a newly registered investment adviser, as of the date of this brochure the Firm does not manage any client assets. The Firm does not participate in any wrap fee programs, nor does it intend to participate in such programs in the future.

B. FEES AND COMPENSATION

For its discretionary asset allocation and management services, Finaport Americas charges 50 to 125 bp of assets under management. The investment management fees charged by the Firm are based on the gross value of assets under management (*i.e.*, without deduction of any loans, credits or other repayable amounts outstanding). The Firm will establish the valuations binding for the calculation of the management fee based on data gathered from information systems generally used in the financial sector.

For outside manager referrals through the FAA Program, Finaport Americas charges 25 to 100 bp of assets under management. This fee is in addition to the fees charged by the FAA Program and the third-party investment manager. The total fees charged by Finaport Americas, the FAA Program and the third-party investment manager typically amount to 50 to 200 bp of assets under management. The fees charged by outside asset managers are based on the methodologies determined by the outside asset managers and may differ from the fees charged and the methodologies used by the Firm.

As discussed in Section C, Finaport Americas also may be compensated through performance-based fees.

Finaport Americas bills clients on a quarterly basis in arrears of services rendered. The exact fee charged is negotiated with the client on a case-by-case basis and depends on the level of services provided.

In addition to the investment advisory fees listed above, clients may incur other types of fees and expenses in connection with the investment advisory services Finaport Americas provides, such as custodian fees, mutual fund fees, brokerage fees, and other transaction-related charges. Mutual fund fees and expenses may include a management fee, initial or deferred sales charge, distribution fee, or other fees and expenses. Please see Section I for a discussion of Finaport Americas' brokerage practices.

Certain supervised persons of the Firm may be registered representatives of Halen Capital, an unaffiliated SEC registered broker-dealer and FINRA member firm and a registered investment adviser in the state of Florida. In their capacity as registered representatives, supervised persons may receive commissions in connection with clients' purchase and sale transactions. The receipt of such compensation may create an incentive to recommend investment products to clients based on the compensation the supervised persons receive, rather than based solely on the clients' needs. The Firm has procedures designed and implemented to ensure supervised persons act in the best interests of clients and to prevent the receipt of transaction-based compensation from influencing their investment decisions. Clients may direct Finaport Americas to execute trades through broker-dealers other than Halen Capital.

C. PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

At a client's request, Finaport Americas may accept performance-based fees as compensation, in whole or in part, for the investment advisory services it provides. The exact amount of such compensation is negotiated with the client on a case-by-case basis. Finaport Americas will structure any performance-based fee arrangement that is subject to Section 205(a)(1) of the Investment Advisers Act of 1940 in accordance with the available exemptions thereunder, including the exemption set forth in Advisers Act Rule 205-3.

Performance-based fee arrangements may create an incentive for Finaport Americas to make investments which may be riskier or more speculative than those which would be made under a different fee arrangement. Such fee arrangements also create an incentive for Finaport Americas and/or its supervised persons to favor those client accounts which pay a performance-based fee. Finaport Americas has procedures designed and implemented to ensure that all of its clients are treated fairly and equally, and to prevent the conflicts raised by performance-based fees from influencing the allocation of investment opportunities among clients. Finaport Americas periodically reviews its client accounts to ensure that no client has been unfairly advantaged or disadvantaged as a result of a performance-based fee arrangement.

D. TYPES OF CLIENTS

Finaport Americas generally provides investment advice to high net worth individuals, their families and their representatives (*e.g.*, family offices) as well as certain institutional clients. The minimum account size is typically \$3 million, although in certain circumstances the minimum account size requirement may be waived.

E. METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

Finaport Americas tailors its investment advice to each client taking into consideration, among other factors, the client's income and liquidity needs, risk profile and investment objectives. The Firm utilizes the Finaport Client Questionnaire to solicit information on these and other investment parameters of its clients. Through the Questionnaire and discussions with clients, the Firm creates a unique investment profile for each client account. Pursuant to a contractual relationship with the Firm, the FAA Program then applies a portfolio generation model to each client profile to create an investment proposal which utilizes risk (as measured by monthly standard deviation of expected returns) to recommend asset classes and either specific securities or third-party investment managers. Finaport Americas may supplement each such investment strategy by recommending additional investments, including but not limited to exchange-traded funds, mutual funds, and hedge funds, in order to create the optimal portfolio for the client's needs. Finaport Americas typically manages each client portfolio through a combination of both traditional and modern theories of portfolio construction in order to create a risk-return profile that meets the client's diversification requirements.

Although Finaport Americas' investment strategies are designed to meet the individual needs and objectives of its clients, there can be no assurance that any such investment strategy will be successful or will attain attractive returns.

Where client assets are managed by a third-party investment manager the Firm has recommended, the success of such accounts will largely depend on investment decisions that are made without the Firm's input.

Investing in securities involves risk of loss that the Firm's clients should be prepared to bear. Depending on the types of securities invested in, a client may face the following investment risks, among others:

- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Emerging Companies and Markets:** Emerging markets typically have less developed economies and regulatory systems, and may be subject to greater political, social, and economic instability and operational risk. Emerging companies tend to have smaller capitalizations and fewer resources and, therefore, are more vulnerable to financial failure. Emerging companies also have shorter operating histories on which to judge future performance. Investments in more mature companies in the expansion or profitable stage also involve substantial risks. These companies typically have obtained capital to expand rapidly, and the significant changes can cause problems in sales, manufacturing and general management. These companies may require substantial amounts of financing which may not be available through institutional private placements or the public markets. The percentage of companies that survive and prosper can be small.

F. DISCIPLINARY INFORMATION

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

G. OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Finaport Americas has relationships that are material to its advisory business with the following related persons:

Finaport Ltd. is owned and controlled by Finaport Holding Ltd. Finaport Ltd. has its principal office and place of business in Zurich, Switzerland and is an investment adviser that is a member of the Swiss Association of Asset Managers. Finaport Ltd. provides certain administrative and back office services at no cost to Finaport Americas.

Finaport Asset Management Ltd. is owned and controlled by Finaport Holding Ltd. Finaport Asset Management Ltd. has its principal office and place of business in Zurich, Switzerland. Finaport Asset Management Ltd. provides certain research services at no cost to Finaport Americas.

Finaport Pte Ltd. is owned and controlled by Finaport Holding Ltd. Finaport Pte Ltd. has its principal office and place of business in Singapore and is an investment adviser regulated by the Monetary Authority of Singapore. Finaport Pte Ltd. provides certain research services at no cost to Finaport Americas.

Finaport (Hong Kong) Ltd. is owned and controlled by Finaport Holding Ltd. Finaport (Hong Kong) Ltd. has its principal office and place of business in Hong Kong and is an investment adviser regulated by the Securities and Futures Commission of Hong Kong. Finaport (Hong Kong) Ltd. provides certain research services at no cost to Finaport Americas.

MRB Vermögensverwaltungs AG (“MRB”) is owned and controlled by Hellmut Schüemperli and Alex Borissov. MRB has its principal office and place of business in Zurich, Switzerland and is an investment adviser licensed by the Swiss Financial Market Supervisory Authority and is a member of the Swiss Association of Asset Managers. Finaport Americas may recommend or select certain funds managed by MRB as investments for the Firm’s clients, which may create a conflict of interest with the duties the Firm owes to its clients. Finaport Americas has adopted procedures which are designed to ensure its supervised persons act in the best interests of client accounts. Clients may place restrictions on the securities or types of securities in which the Firm invests on their behalf.

Finaport Americas is not registered, and is not currently applying for registration, as a broker-dealer, futures commission merchant, commodity pool operator or commodity trading advisor. The Firm may select or recommend Halen Capital, an unaffiliated SEC registered broker-dealer and FINRA member firm and a registered investment adviser in the state of Florida, for its clients’ brokerage transactions. Certain management persons of the Firm may be registered representatives of Halen Capital. In their capacity as registered representatives, such management persons may receive transaction-based compensation in connection with clients’ purchase and sale transactions. Please see Section B for additional information.

As disclosed in Section A, Finaport Americas may refer third-party investment managers to clients through the FAA Program. Finaport Americas does not receive any compensation from the FAA Program or the third-party investment managers for making such recommendations.

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

Finaport Americas has adopted a Code of Ethics which describes certain standards of conduct for its supervised persons, prohibits trading on the basis of inside information, and addresses the personal trading of the Firm's supervised persons and certain of their family members.

Finaport Americas does not buy or sell securities for its own account. Finaport Americas' related persons, including its employees, officers and directors, may invest in the same securities that are bought and sold for, or are recommended to, clients. The Firm may also recommend to, or invest for, clients in securities in which it or its related persons have a material financial interest. This presents a potential conflict between the interests of the Firm and its related persons on the one hand, and the interests of the Firm's clients on the other. Finaport Americas' Code of Ethics is designed to protect clients' interests and prohibits Finaport Americas' supervised persons from engaging in securities transactions and activities for their own accounts that might conflict with or be detrimental to clients' interests. Accordingly, such persons must obtain the approval of a designated principal before buying or selling any security, except for mutual funds. If approved, such permission will be good only for the period of time specified therein. If the approved trade is not executed within the time specified, a new clearance must be obtained.

Finaport Americas monitors compliance with its Code of Ethics through a review of supervised persons' securities/brokerage statements on a quarterly and annual basis.

Finaport Americas will provide a complete copy of its Code of Ethics to any client or prospective client upon written request.

I. BROKERAGE PRACTICES

Finaport Americas may select or recommend broker-dealers for its clients' brokerage transactions. In making broker-dealer selections and recommendations, the Firm endeavors to achieve "best execution." Among the best execution factors the Firm may consider are: commission rates; the quality, accuracy and efficiency of trade executions; the size and complexity of a particular transaction; the creditworthiness of the broker-dealer; the level of service the broker-dealer provides; and research services provided to Finaport Americas. In making selections and recommendations Finaport Americas does not consider whether the Firm or any of its related persons receive client referrals from a broker-dealer or third-party.

Certain supervised persons of Finaport Americas may also be registered representatives of Halen Capital, an unaffiliated SEC registered broker-dealer and FINRA member firm and a registered

investment adviser in the state of Florida. Finaport Americas may select or recommend Halen Capital for clients' brokerage transactions. Please see Section B for additional information.

The research Finaport Americas receives from broker-dealers who effect trades for client accounts (which are sometimes called "soft-dollar" services) may include analyses of securities, industries, or asset classes. The Firm may cause clients to pay higher commissions than those charged by other broker-dealers in return for research services. The Firm may use such services for the benefit of all managed accounts, not just those accounts whose commissions paid for them, and the Firm does not seek to allocate soft-dollar benefits to accounts in proportion to the commissions the accounts generate. While the receipt of research in connection with client securities transactions benefits clients by enabling the Firm to make more informed investment decisions, such arrangements might also be seen to benefit Finaport Americas because the Firm does not have to produce or pay for such research. For this reason, the Firm may have an incentive to select or recommend a broker-dealer based on its interests instead of those of clients.

In order to protect clients' interests, Finaport Americas has adopted policies and procedures designed to ensure that its soft-dollar practices qualify for the safe harbor established under Section 28(e) of the Securities Exchange Act of 1934. In this regard, the Firm takes steps to confirm that client commissions are used only for services that provide lawful and appropriate assistance in carrying out the Firm's investment decision-making responsibilities. Where one service is useful both in making investment decisions for managed accounts and in performing administrative or other non-brokerage or research functions, the Firm reasonably allocates the cost of the service, so that the Firm uses portfolio commissions from managed accounts to pay for the portion that assists in the investment decision making process and the Firm uses its own funds to pay for the portion that provides other assistance.

Furthermore, Finaport Americas periodically reviews the soft-dollar products and services it receives to confirm their continued usefulness in making or implementing investment decisions for clients.

Directed Brokerage

To the extent permitted by the terms of the investment management agreements between Finaport Americas and its clients, the Firm's clients may also direct the Firm to place trades for their accounts with particular broker-dealers. In such instances, the Firm will only trade with broker-dealers the client selects. Thus, the Firm's ability to negotiate brokerage commission rates may be diminished and the Firm will not have the opportunity to aggregate the client's orders with other orders for the purchase and sale of securities. Thus, such clients may pay higher costs.

Trade Aggregation

In order to improve the quality of executions, Finaport Americas may aggregate orders to buy or sell a particular security on behalf of all clients who have authorized the Firm to select broker-dealers for their trades. Such bundled orders are typically more efficient for a broker-dealer to execute and can be completed at lower cost than trades entered separately.

Because the Firm manages accounts on an individual as opposed to collective basis, the timing or nature of action by the Firm may differ from account to account. Thus, it is not always possible for the Firm to bundle orders for all clients who have authorized the Firm to select broker-dealers for their trades. Where Finaport Americas does not aggregate orders, clients may incur higher costs.

J. REVIEW OF ACCOUNTS

Finaport Americas monitors its clients' accounts on an ongoing basis to evaluate each client's portfolio in light of the client's investment objectives and needs. In performing such reviews, the Firm uses internally generated reports as well as reports from third-party service providers to examine the securities holdings, executions and overall performance trends of the client's portfolio. Clients receive written reports outlining these and other aspects of their portfolios on an annual basis. The Firm may also provide such reports on a quarterly basis upon the request of a client. Market conditions and/or other significant events may also trigger a review of a client's account, as deemed necessary by the Firm. Reviews of client accounts are conducted by the Manager of Finaport Americas.

On at least an annual basis, the Firm will also engage in a consultation with each client to review the client's financial plan and to evaluate the client's portfolio, including asset allocation and the performance of any third-party investment managers.

K. CLIENT REFERRALS AND OTHER COMPENSATION

The Firm does not receive any economic benefit for its investment advisory services other than the compensation discussed in Section B and the soft dollar benefits discussed in Section I. The Firm may compensate third parties for client referrals in certain circumstances, although it is not presently party to any such arrangements. Any arrangements with third party solicitors will be structured in a manner consistent with SEC Rule 206(4)-3.

L. CUSTODY

This item does not pertain to Finaport Americas' business. The Firm does not have custody of any client funds or securities.

M. INVESTMENT DISCRETION

As discussed in Section A above, Finaport Americas may exercise discretionary asset allocation and management authority on behalf of its clients, subject to any investment restrictions in particular securities or asset classes or other directions imposed by clients. Finaport Americas will trade on margin in a client's account and will assist clients in securing loans and pledging their collateral only at the specific request and direction of the client and with the client's prior written approval.

The Firm's discretionary authority is documented in the advisory contract and limited power of attorney between the Firm and a client. These documents are filed with the client's qualified custodian.

N. VOTING CLIENT SECURITIES

Finaport Americas will exercise voting rights related to equity investments only upon express and specific instructions from a client. Where the Firm does accept such voting authority, the Firm will vote proxies consistent with its proxy voting policies and procedures, which are designed to ensure the Firm votes proxies in the best interests of its clients. Clients may request that proxies relating to their portfolio securities be voted in a specific manner, provided that such requests are submitted in writing to the Firm at least 60 days prior to the voting deadline.

In the event that a proxy vote raises a potential conflict of interest for Finaport Americas, the Firm will either disclose the potential conflict to clients and obtain their consent to the Firm's vote recommendation, or will seek advice from and follow the recommendation of an independent third party on the issue.

The Firm will provide a copy of its proxy voting policies and procedures and information on how it voted client securities upon a client's written request.

O. FINANCIAL INFORMATION

This item does not apply to Finaport Americas' business. Finaport Americas does not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance. There is no financial condition that is reasonably likely to impair Finaport Americas' ability to meet its contractual commitments to clients. Finaport Americas has never been the subject of a bankruptcy petition.