



Part 2A of Form ADV: Firm Brochure

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This brochure provides information about the qualifications and business practices of STRATEGY ASSET MANAGERS, LLC. If you have any questions about the contents of this brochure, please contact us at: (201) 822-3001, or by email to: [feedback@strategyasset.com](mailto:feedback@strategyasset.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.

Registration with the SEC or with any state securities authority does not imply a certain level of skill or training.

Additional information about STRATEGY ASSET MANAGERS, LLC is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

March 5, 2014

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## Item 1: Material Changes

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### Annual Update

The Material Changes section of this brochure will be updated annually, or when material changes occur since the previous release of the Firm Brochure.

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### Material Changes since the Last Update

This brochure is dated March 5, 2014 and updates the Firm Brochure dated March 25, 2013.

There are no material changes to this brochure.

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### Full Brochure Available

To request a copy of the Form ADV Part 2A Firm Brochure, please contact us at (201) 822-3001 or email [feedback@strategyasset.com](mailto:feedback@strategyasset.com).

## Item 2: Advisory Business

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### Firm Description

Strategy Asset Managers, LLC, (“SAM” or “the Firm”) was founded in 2001.

The Firm provides personalized confidential investment management services to individuals, public entities, pension and profit sharing plans, trusts, estates, charitable organizations, limited and family partnerships, foundations and business entities. Advice is provided following a consultation with the client, review of investment objectives and the mutual agreement between client and the Firm regarding which of the company’s investment strategies best meets the client’s investment objectives and risk profile. In addition to direct contact with a client, the same or similar consultation can be had with the client’s financial advisor who, in combination with the client, has determined that one of the investment strategies offered by the Firm best fits his client’s financial objectives.

Independent investment consulting firms can also select the Firm’s strategies for their clients that wish to utilize one or more of the firm’s investment strategies.

The client or the client’s representative will make the final decision on selecting the Firm and the appropriate strategy for the client.

The Firm is *not a custodian* of the client’s assets. The client always maintains control of his/her assets through the independent, third-party custodian selected by the client. SAM’s sole authority, as defined in its Investment Advisory Agreement, is to implement investment decisions on behalf of the client entities.

The client can engage other professionals (e.g. lawyers, accountants, consultants) to assist them in establishing their financial goals and objectives. The Firm will often meet with the designated parties to review the appropriateness of the investment strategies employed by SAM, but its role is solely that of investment manager implementing the client’s investment strategy by buying securities on his/her behalf.

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**Principal Owners**

Robert M. DeMichele is the Firm's Managing Member, and he owns and controls 100% of the company. In addition, key employees participate directly through bonuses and commission incentives in the success of the company.

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**Types of Advisory Services**

The Firm provides asset management services. These services encompass the selection of stocks, bonds, mutual funds, and ETFs. All securities purchased trade on a traded exchange or in a national market where the price of a security can be readily verified.

As of December 31, 2013, SAM manages approximately \$566 million in assets for approximately 541 clients. One hundred percent of the assets are managed on a discretionary basis.

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**Tailored Relationships**

The goals and objectives are reviewed for each client and are documented. Clients may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without client consent.

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**Types of Agreements**

The Firm has several types of agreements, e.g., individual, institutional, wrap platform and mutually defined agreements with public entity clients.

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**Advisory Service Agreement**

The Firm's Investment Advisory Agreement defines the typical client relationships.

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**Investment Management Agreement**

An *Investment Management/Advisory Agreement* that specifies the investment strategy to be utilized and the responsibilities of the investment manager/adviser is executed by the client and the Firm. Investment management/advisory agreements are also established directly with a client's representative when the client working with a major financial brokerage firm has identified SAM as an investment adviser to make investment decisions on behalf of his/her client.

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**Asset Management**

Stocks and bonds may be purchased or sold through a brokerage account when appropriate. The brokerage firm may charge a fee for stock and bond trades. The Firm does not receive compensation, in any form for stock or bond transactions.

Investments may include equities (stocks), corporate debt securities, municipal securities, U.S. government securities, mutual funds, ADRs and ETFs.

Initial Public Offerings (IPOs) are not purchased or sold through the Firm.

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**Termination of Agreement**

A client may terminate the investment management/advisory agreement with SAM at any time by notifying the Firm in writing and paying the investment advisory fee for the time spent on the investment advisory engagement prior to notification. The Firm's investment advisory agreement specifies a 30 day notice period. The Firm bills quarterly in advance. The client is entitled to a full reimbursement of the portion of the fee not utilized following the written notification.

The Firm may also terminate the investment management/advisory agreement at any time by notifying the client in writing and returning to the client the unearned portion of the management fee that was paid by the client in advance.

**Item 3: Fees and Compensation**

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**Description**

The Firm bases its fees on a percentage of assets under management as specified in its fee schedule. SAM's fees are negotiable based upon the degree of service offered. Shown below is an array of the fee schedules the Firm utilizes:

Institutional & Private "direct"

0.750% for first \$25 million

0.625% for next \$25 million

0.500% thereafter

Private Client – Third Party

1.000% on the first \$1 million

0.600% on the next \$2 million

0.450% on the next \$2 million

0.300% over \$5 million

Wrap Fee Platform Schedule

Range from .370% to .500%

Aggregate Fee Schedule / Related Parties

First \$20 million 1.000%

Next \$20 million 0.875%

Next \$20 million 0.750%

Next \$20 million 0.625%

Over \$80 million 0.500%

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**Fee Billing**

Investment management fees are billed quarterly, in *ADVANCE*, meaning that we invoice the client *BEFORE* the three-month billing period has *BEGUN*. Payment in full is expected upon receipt of the invoice. Fees are usually deducted from a

designated client account to facilitate billing. The client must consent in advance to direct the debiting of his/her investment management account. In a limited number of instances (most often IRAs) the client may choose to pay the fee from an outside account.

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**Past Due Accounts and Termination of Agreement**

The Firm reserves the right to discontinue investment advisory services on any account that is more than 90 days overdue.

**Item 4: Performance-Based Fees**

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**Sharing of Capital Gains**

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

The Firm does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for an adviser to recommend an investment that may carry a higher degree of risk to the client.

**Item 5: Types of Clients**

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**Description**

The Firm provides personalized confidential investment management/advisory services to individuals, public entities, pension and profit sharing plans, trusts, estates, charitable organizations, limited and family partnerships, foundations and business entities.

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**Account Minimums**

For individuals that are not associated with a broker dealer, the Firm's minimum account size is \$250,000 which equates to an annual fee, under our standard fee schedule, of \$2,500. If an account falls below the minimum, the Firm encourages the client to bring the assets up to meet the minimum. Although our investment management agreement states that we reserve the right to charge the minimum fee, in practice that has never been done. The Firm is very conscious of the negative effect management fees can have on a client's investment performance.

The Firm also reserves the right to waive the account minimum and will generally do that when a client has assets with the Firm in other accounts that are well in excess of our minimum.

With respect to major brokerage firms where we participate on their platform programs (wrap programs), the Firm's account minimums can be as low as \$50,000. However, the majority are \$100,000 or greater, even on these programs.



## **Item 6: Methods of Analysis, Investment Strategies and Risk of Loss**

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### **Methods of Analysis**

The methods of analysis vary by the strategy being executed. The Firm offers three investment strategies: Worldwide Equity, Worldwide Dividend Plus and Market Oriented Core. These strategies can be utilized as 100% equity (stocks) or as a balanced strategy utilizing fixed income securities.

The investment research utilized is dependent upon the strategy. The investment management team is responsible for conducting the research that leads to an individual stock or bond being purchased in the portfolio.

The Firm utilizes extensive outside research such as Thompson Reuters, Value Line, Bank Credit Analyst, investment newsletters, outside private research, daily publications, and research provided by many of the well known investment banking firms. The Firm also pays an outside firm for its proprietary research. We are also in touch with our peers to discuss trends and potential areas of opportunity. We listen to company conference calls, attend analyst meetings and industry conferences when appropriate. In addition, we read company reports, Securities and Exchange Commission filings and are voracious readers of numerous daily publications that may have both a positive or negative effect on our holdings.

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### **Investment Strategies**

#### **Worldwide Strategy**

It is a bottom up strategy where we buy securities at a discount to fair value, i.e., at a price we deem as below what we believe the company (security) should be selling at based upon our analysis of the company and based upon the future outlook for the company. We sort through a large number of companies to arrive at a portfolio of 30 to 35 of our best ideas fitting our relative value criteria. A company is sold from the portfolio when it hits what we perceive as fair value or replaced by a company that we believe is more undervalued and represents greater upside potential.

#### **Worldwide Dividend Plus**

This strategy utilizes many of the same research inputs identified under Methods of Analysis (Item 6) but also employs an additional screen that seeks to identify companies that are consistently growing their dividends annually or have a history of having a stable dividend payout ratio. The objective is to generate a dividend return more than twice that of the S&P 500 to help clients who are in need of current cash flow. Historically, this strategy would provide less growth potential as it trades off growth for higher dividend return.

#### **Market Oriented Core**

This is our quantitative strategy that is based on proprietary research of an outside research firm. We purchase the research, rank the stocks in the S&P 500 based upon

this research and then conduct bottom up analysis on the top 100 to determine the candidates we wish to include in a portfolio. A key difference with respect to this strategy is that at 6 month intervals, the process repeats itself, i.e. rank the stocks in the S&P 500, and repeat the research again to build a portfolio. Another key difference with this strategy is that it has an automatic sell discipline whereby if the company drops out of the top 100 ranked S&P 500 stock at the 6 month review period, it is automatically sold, i.e. an automatic sell discipline.

#### Bonds

We will purchase bonds for any of these strategies when a client selects a balanced account/portfolio. We buy high quality U.S. Treasuries, Governments and Agency backed mortgages or high quality corporate bonds.

We have access to research that provides credit ratings, but do not perform extensive research on undervalued companies.

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#### **Risk of Loss**

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- **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.
- **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.
- **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.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.

- **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.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

## **Item 7: Disciplinary Information**

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### **Legal and Disciplinary**

The firm and its employees have not been involved in legal or disciplinary events related to past or present investment clients.

## **Item 8: Other Financial Industry Activities and Affiliations**

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### **Financial Industry Activities**

The Firm is registered with the Securities and Exchange Commission as an investment adviser.

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### **Affiliations**

The Firm is not affiliated, through ownership or fee participation, with anyone that could be construed as an affiliated party. The Firm uses National Financial Services, a division of Fidelity, as custodian for its independent clients though a non-affiliated relationship with Mid Atlantic Capital Corporation, i.e., not affiliated with a broker dealer or other custodian. Mid Atlantic Capital Corporation has determined that National Financial Services is the custodian they wish to utilize for clients such as SAM. We concur with this decision in view of Fidelity's financial strength, national reputation, and high level insurance protection of our non-affiliated clients.

The Firm sometimes directs brokerage to Weeden & Co., LP, which is a broker dealer. The Firm is not obligated to direct transactions for its clients to Weeden. The Firm believes that in some cases its clients receive better execution quality for program and non-program trades through Weeden. Mr. DeMichele serves as a member of Weeden's Board of Directors where he attends quarterly committee meetings. Mr. DeMichele received compensation of \$1,000 per meeting. As a board member, Mr. DeMichele participates in the following committees: Advisory Committee, Unit Committee, and Compensation Committee. Calendar year 2013, \$141,742.53 in clients' commissions were directed to Weeden.

There are no other relationships that could be construed as being affiliated.

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**Item 9: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading****Code of Ethics**

The Firm's employees have committed to a Code of Ethics that is available for review by clients and prospective clients upon request.

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**Participation or Interest in Client Transactions**

The Firm and its employees may buy or sell securities that are also held by clients. Employees may *not* trade his/her own securities ahead of client trades. All employees must comply with the provisions concerning employee trading contained in the Firm's Code of Ethics and Compliance Manual.

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**Personal Trading**

The Firm's Chief Compliance Officer is Robert M. DeMichele. He reviews all employee trades each quarter. Mr. DeMichele's trades are reviewed by Alan Wapnick, Senior Vice President. These personal trading reviews ensure that the personal trading of employees does not affect the markets, and that clients of the firm receive preferential treatment. Most employee trades are of small order size, in widely-held securities, or in mutual funds or exchange-traded funds, and thus, employee trades generally do not affect the securities markets.

**Item 10: Brokerage Practices**

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**Selecting Brokerage Firms**

The Firm is not affiliated with any brokerage or product sales teams. The Firm will not recommend brokerage firms. Occasionally, if asked by the client about a custodian recommendation, we may offer an opinion/recommendation, but are not affiliated with any custodian. Obviously, we are aware of the custodians that have financial strength, integrity, and the ability to handle a specific client need, i.e. trusts, estates, etc., but as a matter of standard business practice, we do not recommend custodians.

The Firm never recommends brokerage firms and is only involved with a client decision to select a custodian when the client is not affiliated with a brokerage firm and chooses to be an independent client of the Firm (no broker or financial advisor involved).

Unless otherwise directed, the Firm utilizes the services of Mid Atlantic Capital Corporation, a broker-dealer, to execute trades on behalf of those clients that are not affiliated with a financial advisor or brokerage firm. Mid Atlantic Capital Corporation uses National Financial Services, a division of Fidelity, as the custodian for those accounts.

The Firm does not receive or participate in brokerage commissions. Its sole source of revenue is investment management fees billed on a quarterly basis.

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**Best Execution**

The Firm will seek to obtain the best execution for client transactions, not necessarily the lowest commission but the best overall qualitative execution.

Some clients contract the Firm to execute transactions through a particular broker (directed broker). The Firm has disclosed to such clients that the Firm cannot guarantee best execution on every transaction when the client has directed the use of a particular broker. The Firm does not receive any portion of the trading fees/commissions.

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**Soft Dollars**

The Firm utilizes research, research-related products and other services on a soft dollar commission basis to a very limited extent. The Firm's soft dollar policy is to make a good faith determination of the value of the research product or services in relation to the commissions paid. Soft dollars are only utilized for research products and services that contribute/assist directly in the investment decision making process.

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**Order Aggregation**

The Firm will aggregate transactions where possible and when advantageous to the client for best execution and more favorable commission terms. In these instances, clients participating in any aggregated transaction will receive an average share price and transaction costs will be shared equally and on a pro-rata basis. As a matter of policy, allocation procedures must be fair and equitable to all clients with no particular group or client being favored or disfavored.

**Item 11: Review of Accounts**

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**Periodic Reviews**

Account reviews are performed quarterly at a minimum by the portfolio managers, Robert DeMichele and Alan Wapnick. However, in practice, accounts are scanned weekly for outsized positions, concentration in a sector, excess cash, etc., so remedial action can be taken.

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**Review Triggers**

Our standard practice is to review accounts. However, there are specific reviews we conduct annually with respect to taxable accounts. As a standard practice, we will notify our clients and their financial advisors as to whether they want to accelerate loss or gain taking in view of the client's overall realized gain position. Often, we are managing only a portion of the client's assets and as such, are not aware of his/her entire tax strategy needs. Hence, we send the letter out annually.

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**Regular Reports**

Report reviewers are members of the portfolio team and supporting staff that help flag outsized positions, cash, performance outliers, or undue concentration.

Clients receive monthly reports from their custodian and on a quarterly basis a report from the Firm that provides an investment review of the portfolio and the firm's

investment outlook. We **urge** clients to compare these reports. We are also available to discuss any report with the client and his/her advisor. In addition, our client service Senior Vice Presidents attempt to meet with all clients, at a minimum, on an annual basis. In fact, we meet with many clients on a quarterly or semi-annual basis. The independent clients that are using National Financial Services as a custodian, can access their reports on line on a daily basis.

## **Item 12: Client Referrals and Other Compensation**

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### **Incoming Referrals**

The Firm has been fortunate to receive many client referrals over the years. The referrals come from current clients, estate planning attorneys, accountants, employees, personal friends of employees and other similar sources. The firm does not compensate referring parties for these referrals.

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### **Referrals Out**

The Firm does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

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### **Other Compensation**

A fee, less than \$2,500, is paid to SAM for participating in a client's investment committee and attending meetings.

## **Item 13: Custody**

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### **Custody of Assets**

The Firm does not maintain custody of client assets, but client assets are indirectly debited (by each client's custodian) to pay fees to SAM upon submission to the custodians of properly constituted invoices.

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### **Account Statements**

All assets are held at qualified custodians, which means the custodians provide account statements directly to clients at his/her address of record at least quarterly.

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### **Performance Reports**

Clients are **urged** to compare the account statements received directly from his/her custodians to the performance report statements provided by the Firm.

## **Item 14: Investment Discretion**

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### **Discretionary Authority for Trading**

The Firm, through its investment management/advisory agreement, has the discretionary authority to manage securities on behalf of its clients. The Firm has been granted the authority to determine, without specific prior client consent, the securities to be bought or sold for his/her account.

We inform independent clients (not affiliated with the broker-dealer) about the commission rates paid by SAM to Mid-Atlantic Capital Corporation, a broker-dealer. The Firm does not receive any portion of the commissions paid for trade execution. With respect to those clients that are affiliated with financial advisors or other brokerage firms, the actual discussion of commission rates is between the client and their financial advisor. The Firm does not have the right to, and does not, participate in those discussions and the commissions may be higher or lower than commission rates that SAM is otherwise able to obtain for its clients. The Firm would not be aware of additional services that the financial advisor may be providing the client which would result in a potentially higher commission rate.

By the granting of discretionary trading authority, the trades on behalf of the client are placed promptly and hopefully, opportunistically, resulting in a timely execution of the trade. The Firm does not accept non discretionary clients.

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**Limited Power of Attorney**

A limited power of attorney granted in the Firm's investment management/advisory agreement provides SAM with discretionary trading authority. Similarly, with respect to financial advisors associated with broker dealers, the broker dealers blanket contract with their client provides the authority to SAM to make investment decisions on behalf of their client.

**Item 15: Voting Client Securities**

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**Proxy Votes**

The Firm votes proxies on behalf of clients that have designated SAM as having the authority to vote on their behalf. In addition, the Firm recognizes that it has a fiduciary obligation to assume proxy-voting duties on ERISA accounts, unless the plan's fiduciary specifically instructs to the contrary.

A copy of the Firm's proxy voting policy is available upon request.

**Item 16: Financial Information**

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**Financial Condition**

The Firm does not have any financial impairment that will preclude it meeting its contractual commitment to clients. The financials of the Firm are audited annually by an independent accounting firm, Marks, Paneth and Shron, Woodbury, NY, a large independent firm with a specialty in broker dealers and investment management firms. If requested, we provide a balance sheet to clients.

**Item 17: Business Continuity Plan**

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**General**

The Firm has a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications, services or key people.

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**Disasters**

The Business Continuity Plan covers natural disasters such as snow storms, hurricanes, tornados, and flooding. The Plan covers man-made disasters such as loss of electrical power, loss of water pressure, fire, bomb threat, nuclear emergency, chemical event, biological event, T-1 communications line outage, Internet outage, railway accident and aircraft accident. Electronic files are backed up daily and archived offsite.

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**Alternate Offices**

The Firm, through its disaster recovery site, has access to client records from a home location or if need be, facilities are available at our Pennsylvania Disaster Recovery site. We test working through that site regularly. In addition, the financial firms that we work with have their own disaster recovery plans, offering a second level of protection ensuring that no client is disadvantaged.

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**Loss of Key Personnel**

If in the event of the death or incapacitation of the Managing Member of Strategy Asset Managers, LLC, Robert M. DeMichele, two Senior Vice Presidents would take over the management of the firm triggering a 20% ownership participation in the firm and assumes responsibility for managing the ongoing entity. In effect, they would be transformed as profit participants in the bottom line of the firm based upon their individual contributions, to direct owners reflecting the larger scope of their responsibilities.

**Item 18: Information Security Program**

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**Information Security**

The Firm has encrypted its client information file with access passwords to protect the information of our clients. In addition, all file cabinets have locks on premises and the offices have electronic key card entry. The buildings we rent our office locations are also, Class A, real estate – secure buildings.

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**Privacy Notice**

Strategy Asset Managers, LLC (“SAM”)is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us.

The categories of nonpublic information that we may collect may include information about personal finances, investment experience and risk preferences. The objective is to gather information so that we can properly recommend an investment strategy that meets with a clients risk tolerances.

With the clients written permission, we will release information to whomever they designate. The ultimate responsibility of what the designated recipient does with that information is not SAM’s responsibility.

The client has the ability to notify us in writing of their desire to opt out of any personal data sharing arrangements that they previously approved.



We maintain a secure office to ensure that data is not placed at unreasonable risk.

We do not provide personal information to mailing list, vendors or solicitors. Federal and State securities regulators may review our Company records and personal records as permitted by law.

We are required by law to deliver the Firm's *Privacy Notice* to clients annually.