

SAUBERAN & COMPANY

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This brochure provides information about the qualifications and business practices of Sauberan & Company. If you have any questions about the contents of this brochure, please contact us at 716-439-1265 and/or csauberan@sauberanandcompany.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 Sauberan & Company also is available on the SEC's website at www.adviserinfo.sec.gov.

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Disclosure Statement (1/1/12)

This Disclosure Statement contains information relating to Sauberan & Company and the nature of its business. This Disclosure Statement is delivered in accordance with Part 249 of Chapter II of Title 17 of the Code of Federal Regulations under the Securities Exchange Act of 1934, as amended, and in particular, Section 275.204-3 of said Regulations. If you are a new or prospective client, this statement has either been delivered to you: a) at least 48 hours in advance of you entering into an investment advisory contract or b) at the time of your entering into such a contract, in either case you have five (5) business days in which to terminate this contract without penalty.

Advisory Business

Sauberan & Company has been offering financial planning and investment advice to individuals, retirement plans, trust accounts and corporations since 1987. As of 1/1/2012 the company manages \$76 million on a discretionary basis. In addition, third party administration is offered to defined contribution retirement plans.

Charles K. Sauberan, CFP is the principal owner with more than 24 years experience in the financial services industry and is a certified financial planner.

Our investment philosophy takes a macroeconomic approach to investing using individual securities, stocks, bonds, and options. The basic premise to this approach is that gross domestic product (GDP), corporate earnings, and stock prices are closely correlated over time. Considering the macroeconomic environment our fundamental investment philosophy is based on three main tenets, preservation of capital, long term time horizon (7 – 10 years) and reducing market risk.

Investment advice takes into consideration each clients objectives, time horizon and risk tolerance. Investing in securities involves risk of loss that clients should be prepared to bear.

Fees and Compensation

Consulting fees are billed at an hourly rate of \$150; asset management fees are listed below. Full disclosures of the fees are made prior to providing the service(s) and are agreed upon by written contract. All fees are negotiable.

Sauberan & Company manages assets on a fee-only basis and transacts securities through TD Ameritrade Institutional Services, a full service securities custodian.

Ticket charges for securities transactions are the clients' responsibility, a schedule of transaction fees for stock, bond and option trades is provided on request.

Clients have the total freedom to effect securities with any broker-dealer or financial institution of their choice.

Corporate, Trust and Personal Asset Management Fee Schedule –

Taxable accounts (all options)

\$500,000 and up 1.5%

IRA accounts (limited options)

\$500,000 and up 1.25%

Personal Asset Management Services are provided for accounts with a minimum of \$500,000. Fees are charged quarterly, in arrears, based on the market value of the account on the last day of each quarter.

Annual Pension Plan Administration and Asset Management Fee Schedule

401K and Profit Sharing Plans (Defined Contribution Plans)

\$500,000 and up 1.75%

Minimum Annual Fee \$2,000

Defined Benefit Plans

\$100,000 and up 1.5%

Minimum Annual Fee \$2,000

Fees are based on Sauberan & Company providing both plan administration and asset management services. If a client prefers to contract for either plan administration or asset management services the fees would be 50% of the above schedule, for plans with less than \$500,000 the annual administration fee is \$2,000. .

Note - For Defined Benefit Pension Plans, the fees do not include the actuarial valuation, Schedule B or PBGC reports; these will be completed by a third party administrator. All plan documents and/or document amendments are billed separately

Performance-Based Fees

(Not applicable)

Clients

See “Advisory Business” and “Fees and Compensation”

Methods of Analysis, Investment Strategies and Risk of Loss

See “Advisory Business”

Disciplinary Information

(Not applicable)

Other Financial Industry Activities and Affiliations

(Not Applicable)

Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Sauberan & Company practices the code of ethics established by the CFP Board.

Following are the seven Principles of the code; Integrity, Objectivity, Competence, Fairness, Confidentiality, Professionalism and Diligence.

A copy of our code of ethics is available to any client or prospective client upon request.

From time to time, principals and associates of Sauberan & Company may invest in the same securities as clients. Any and all transactions in client accounts are completed prior to or simultaneously with Sauberan & Company’s accounts.

Brokerage Practices

Brokerage services are selected based on the level of service, transaction fees, “best execution” and technology. Client’s always have the right to trade on any brokerage platform.

Review of Accounts

Sauberan & Company maintains records of all transaction history and cost basis. Tax data, cost basis and performance history are periodically reviewed with the client as requested. TD Ameritrade remits transaction confirmations and monthly statements directly to the clients and representatives.

Client Referrals and Other Compensation

On behalf of Registrant, Registrant serves on the TD Ameritrade Institutional Advisor Panel ("Panel"). The Panel consists of approximately twenty-four independent investment advisors that advise TD Ameritrade Institutional ("TDA Institutional") on issues relevant to the independent advisor community. The Panel meets in person on average three to four times per year and conducts periodic conference calls on an as needed basis. Investment advisors are appointed to serve on the Panel for two year terms by TDA Institutional senior management. An investment advisor may serve longer than two years if appointed to additional terms by TDA Institutional senior management. Registrant's current term expires on 12/31/13. At times, Panel members are provided confidential information about TDA Institutional initiatives. Panel members are required to sign confidentiality agreements. TD Ameritrade, Inc. ("TD Ameritrade") does not compensate Panel members. However, TD Ameritrade pays or reimburses Registrant for the travel, lodging and meal expenses Registrant incurs in attending Panel meetings. The benefits received by Registrant or its personnel by serving on the Panel do not depend on the amount of brokerage transactions directed to TD Ameritrade. Clients should be aware, however, that the receipt of economic benefits by Registrant or its related persons in and of itself creates a potential conflict of interest and may indirectly influence Registrant's recommendation of TD Ameritrade for custody and brokerage services.

Sauberan & Company has used TD Ameritrade to custody clients assets for more than 8 years prior to joining the TD Ameritrade Institutional Advisor Panel.

Sauberan & Company does not compensate 3rd parties for client referrals.

Custody

(Not Applicable)

Investment Discretion

Sauberan & Company will supervise and direct the investments of the Client account with any and all changes as may occur from time to time, subject to such limitations as Client may impose by notice in writing. Sauberan & Company as agent with respect to the Client account, when it deems appropriate, may (a) buy, sell, exchange, convert and otherwise trade in any stocks, bonds, options and other securities including money market instruments, and (b) place orders for the execution of such securities transactions with or through such brokers, dealers or issuers as Sauberan & Company and client may select.

Voting Client Securities

(Not applicable)

Financial Information

(Not applicable)