

SAUBERAN & COMPANY

175 Walnut St.

Suite #2

Lockport, NY 14094

Contact Information

716-553-7282 (c)

716-439-1265 (w)

csauberan@sauberanandcompany.com

www.sauberanandcompany.com

Updated 3/22/2023

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. If you are a client and have not received this brochure, please contact us. 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.

Table of Contents

Disclosure

Advisory Business

Fees and Compensation

Performance-Based Fees

(Not applicable)

Clients

Methods of Analysis, Investment Strategies and Risk of Loss

Disciplinary Information

(Not applicable)

Other Financial Industry Activities and Affiliations

(Not Applicable)

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

Brokerage Practices

Review of Accounts

Client Referrals and Other Compensation

Custody - (Not Applicable)

Investment Discretion

Voting Client Securities – (Not applicable)

Financial Information - (Not applicable)

Disclosure Statement (1/1/23)

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 1990. As of 1/1/2023 the company manages \$26,424,816 million on a discretionary basis.

Charles K. Sauberan entered the financial services industry in 1987 and established Sauberan & Company in 1990. Charles is a CERTIFIED FINANCIAL PLANNER™ and a member of TD Ameritrade Institutional President's Council.

Sauberan & Company's 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%

401(k) Plans, Profit Sharing Plans and IRA accounts (limited options)

\$500,000 and up 1.0%

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. All debt instruments include accrued interest when calculating advisory fees charged to clients.

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. Advisory regularly recommends TD Ameritrade Institutional Services as a leader in the institutional brokerage services industry for custody and trade execution. However, Client's always have the choice to custody and trade on any institutional brokerage platform.

TD Ameritrade Institutional Services reduces trading fees for household values of \$500,000 or more and who choose to have statements and transaction confirms delivered electronically.

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

Advisor serves on the TD Ameritrade Institutional President's Council ("Council"). The Council consists of former Advisor Panel Members who are independent investment advisors that advise TD Ameritrade Institutional ("TDA Institutional") on issues relevant to the independent Advisor community. The Registrant may be called upon periodically to attend Advisor Panel meetings and participate on conference calls or outreaches on an as needed basis. Investment advisors are intended to serve on the Council for an ongoing term by TDA Institutional senior management.

At times, Council members are provided confidential information about TDA Institutional initiatives. Council Members are required to sign this confidentiality agreement. TD Ameritrade, Inc. ("TD Ameritrade") does not compensate Council Members. The benefits received by Advisor or its personnel by serving on the Council 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 Advisor or its related persons in and of itself creates a potential conflict of interest and may indirectly influence Advisor recommendation of TD Ameritrade for custody and brokerage services.

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)