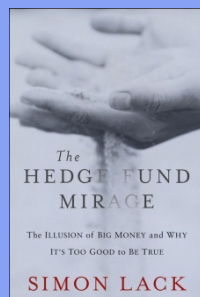




In Pursuit of Value

May, 2012

SL Advisors, LLC is a registered investment advisor offering separately managed accounts to individuals, family offices and institutions.



Less Macro and More Micro

The major themes driving markets somehow seem less urgent of late. European austerity may be softening in the face of growing popular revolt as more Euro-zone countries (now seven) descend into recession. The threat of a crisis is being replaced by the monotony of continued lost output, and the growing chorus of politicians calling for pro-growth policies may well blunt the Teutonic demand for cuts everywhere. While the likely election of a Socialist president in France is hardly auspicious, it could alter the trade-off between fiscal discipline and current economic pain.

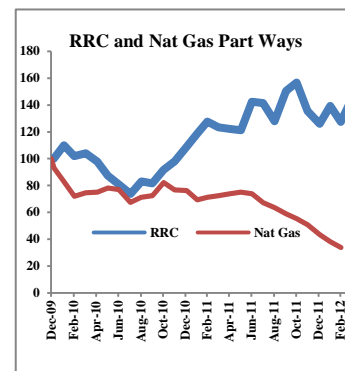
In the U.S. I continue to be fascinated by the Federal Reserve's detailed forecasts of interest rate policy. While Chairman Bernanke provided assurances of further monetary support (QE 3) if needed, the FOMC collectively became modestly more hawkish and now forecasts a 0.75% increase in short term rates during 2014. This is in sharp contrast to the yield curve which, by pricing in expectations for less than half this is expressing an unflattering view of the Fed's forecasting acumen.

China may be about to demonstrate the limits to its growth. Thoughtful analysis in support of a sharp Chinese slowdown (by Hugh Hendry from Eclectica for example) is compelling, and yet this is not a new warning. Correctly assessing the near term macro picture, rarely easy, appears especially hard right now.

Descending from 30,000 feet to look at industries is often far more interesting. I did a call with Park Shaper, President of Kinder Morgan (KMP), recently. KMP is a holding in our MLP strategy and at \$28 BN in market cap is the bellwether for the sector. KMP's strategy through their acquisition of El Paso (EP) late last year (expected to close this quarter) is to be ready to move growing volumes of natural gas around the U.S. as they expect steady increases in demand from electricity generation, commercial transportation and industrial manufacturing that relies on cheap methane. They are going where the puck is going (as Wayne Gretzky always said) and the trend they're following looks inevitable to us. KMP is also investing money in coal export facilities, reasoning that coal's incremental replacement by natural gas will free up more for export. It's a logical strategy, and one that isn't highly sensitive to natural gas prices. In fact, they're betting on a continued abundance of the cheap fuel which would result in higher volumes, benefitting the toll-model so characteristic of MLPs.

We recently added the C-corp., Kinder Morgan Inc. (KMI) to our Hedged Dividend Capture Strategy since its low debt, stable dividend and solid growth prospects make it an attractive investment for income generation.

I also had the opportunity recently to attend an investor dinner with Range Resources' (RRC) senior management. RRC is a holding in our Deep Value Equity strategy. CEO Jeff Ventura has surrounded himself with a solid team that is focused on growing per-share value of the company without taking undue risk. RRC boasts that they have 60 TCFE (trillion cubic feet) of potential low cost natural gas, worth far more than its \$13 BN enterprise value. Jeff Ventura is confident they have that much – time will tell if he's right. While RRC waits for higher natural gas prices, they continue to derive value from "wet" gas, producing natural gas liquids into a much more robust market than exists for natural gas itself.



*SL Advisors, LLC
focuses on
identifying
securities that are
trading at a
discount to intrinsic
value.*

Macro issues will often dominate in the short term, but understanding the fundamentals of individual companies and investing in good businesses with strong balance sheets is our preferred way to withstand the inevitable “tail-events” that hang over almost every investment decision.

The Hedge Fund Lobby Responds

The Hedge Fund Mirage has upset some people, but far fewer than many might expect. The Financial Times recently described me as, “...one of the industry’s most vocal critics.” Financial News has called me, “The industry’s fiercest scourge...” All because I asked how hedge fund investors had done in aggregate, and published the analysis showing they hadn’t made any money while the managers and their service providers had made a great deal of money. And yet in some respects the controversy has been less than I expected. Many hedge fund managers and others in the industry have contacted me to say how they loved my book and that they weren’t at all surprised at the result.

Happily though, the Alternative Investment Managers Association (AIMA) in London has been moved to respond. After all, one of their objectives is to “promote the industry’s global development.” I have been told by more than one journalist that my book has hit a nerve with them, casting doubt as it does on the very utility of their mission. That they are defensive is wholly appropriate for a group advocating investments in an area whose most significant result has been an enormous transfer of wealth from clients to managers. Let me repeat what I frequently point out: there are great hedge funds as well as happy clients and most probably always will be. In the 90s through 2002 hedge funds did a fantastic job for their investors, preserving capital and adding value. There just weren’t that many clients back then, and as they became more numerous the results inevitably deteriorated. The Absolute Return Industry’s IRR is less than treasury bills.

AIMA responded by commissioning a marketing brochure from KPMG showing that a hypothetical investment allocated equally to all hedge funds from 1994 did rather well. This is their basis for advocating hedge funds to investors; they don’t address how all investors did, because they well understand the Math isn’t supportive. Surely the experience of all investors is the most meaningful measure of results when rising AUM so reliably coincides with falling returns. Consequently I quickly took the opportunity to critique their marketing brochure on our blog as well as discuss the weakness of their conclusions on Bloomberg TV. Those interested in more detail can follow along on our [blog](#) (URL on Pg. 4). Journalists, and more importantly hedge fund clients, are starting to challenge the case for hedge funds and their fees, lack of transparency and illiquidity.

Business Update

I founded SL Advisors in 2009 following my retirement from JPMorgan. Shortly afterwards I was joined by Henry Hoffman who researches our investments and whose insights add immeasurably every day to our results. Henry without doubt raised the average IQ here and has become a good friend as well. The capital we manage was initially just mine and that of immediate family. We have not done any formal marketing beyond publishing this newsletter, and so asset growth to this point has been very largely “Friends of Simon” (more numerous than I had any right to expect) asking to open accounts, a vote of confidence which we acknowledge every day. Larry Hirshik, who became a friend when he was trading derivatives in 1984, joined soon after and ably executes our trades.

The passage of time has lengthened our track record and my book has drawn more exposure than I had envisaged. We think we have compelling investment strategies delivered with clarity and see the opportunity to discuss these with people who are (at least not yet!) Friends of Simon. Therefore I am very happy that another old friend of mine from my days trading derivatives in the 80s has joined us to lead business development. Ty Tessitore has broad financial markets’ experience covering high net worth and institutional clients in interest rate and commodity derivatives, structured products and other capital markets products. But even more importantly Ty shares our values, and is someone I first met over 25 years ago. We are excited to have Ty join SL Advisors.

SL Advisors runs a variety of separate strategies in Fixed Income, Equities and Absolute Return. Contact us for more information, or go to our website: www.sl-advisors.com

Hedged Dividend Capture Strategy (%)

	Jan	Feb	Mar	April	May	June	July	Aug	Sept	Oct	Nov	Dec	YTD
2006	0.7	0.7	-1.3	1.4	1.7	1.2	3.6	2.0	0.9	2.3	0.9	1.2	16.2
<i>Index</i>	-0.1	0.7	-1.7	-0.5	-0.4	-0.4	1.6	2.1	1.2	1.1	1.4	-1.1	3.8
2007	0.4	1.3	2.7	1.8	-0.5	-2.2	-2.4	1.9	1.9	2.9	1.9	-0.3	9.9
<i>Index</i>	0.2	2.2	-0.7	0.9	-1.2	-0.4	0.2	1.1	0.6	1.2	0.7	0.4	5.2
2008	-4.0	-0.1	1.7	0.8	1.8	-1.8	1.7	1.6	2.0	-0.1	3.2	-0.2	6.5
<i>Index</i>	1.7	-0.1	-0.7	0.8	-1.0	-0.5	-0.5	0.8	-5.9	-5.1	4.9	8.3	1.8
2009	2.4	-4.3	-1.1	-4.5	1.6	4.4	1.7	-0.2	-0.1	0.5	2.5	2.4	5.0
<i>Index</i>	0.8	-2.1	-0.6	3.1	4.1	2.8	4.6	1.4	1.7	0.7	1.6	-1.5	17.6
2010	-0.7	-1.1	0.6	-0.2	-1.3	3.2	2.1	3.9	-0.1	0.4	-2.4	-0.3	3.9
<i>Index</i>	1.5	0.4	0.2	1.8	-0.6	2.2	2.2	1.9	0.6	0.1	-0.8	-0.8	8.8
2011	-1.8	0.8	1.4	3.1	2.6	0.0	-0.7	4.0	1.7	-0.2	0.0	3.5	16.0
<i>Index</i>	-0.1	0.7	-0.2	1.8	1.6	-0.9	2.6	0.2	0.4	2.2	-2.1	2.4	8.5
2012	-3.5	-2.1	1.1	1.6									-3.0
<i>Index</i>	2.5	1.0	-0.9	0.9									3.5

Returns through September 2011 are from a long portfolio of 58 equally weighted equities from which actual positions are selected, hedged to be beta neutral. This is not a return from an actual portfolio, until October 2011. The Index is the Dow Jones Corporate Bond Index, an equally weighted index of 96 investment grade bonds. Returns are gross of fees. Past performance is not indicative of future returns.

Deep Value Strategy Monthly Returns (%)

	Jan	Feb	Mar	April	May	June	July	Aug	Sept	Oct	Nov	Dec	YTD
2009							8.9	0.6	9.3	1.6	1.4	9.7	35.4
<i>Index</i>							7.6	3.6	3.7	-1.9	6.0	1.9	22.6
2010	-1.3	4.3	3.9	3.1	-3.9	-4.6	4.9	7.2	7.8	1.2	1.0	2.7	28.8
<i>Index</i>	-3.6	3.1	6.0	1.6	-8.0	-5.2	7.0	-4.5	8.9	3.8	0.0	6.7	15.1
2011	0.2	2.6	1.9	2.4	-2.2	-2.8	0.4	-5.1	-9.1	12.1	-0.3	-0.5	-1.7
<i>Index</i>	2.4	3.4	0.0	3.0	-1.1	-1.7	-2.0	-5.4	-7.0	10.9	-0.2	1.0	2.1
2012	4.2	5.3	0.9	2.0									12.9
<i>Index</i>	4.5	4.3	3.3	-0.6									11.9

Returns do not include cash balances prior to November 2009. YTD returns are unannualized compounded returns. The Index is the S&P 500 including dividends. Returns are net of fees. Past performance is not indicative of future returns.

MLP Strategy Monthly Returns (%)

	Jan	Feb	Mar	April	May	June	July	Aug	Sept	Oct	Nov	Dec	YTD
2008	4.5	3.0	-0.8	1.9	4.2	-6.4	-2.0	0.6	-14.9	-1.1	-25.4	7.4	-29.5
<i>Index</i>	-0.6	-0.5	-6.3	7.3	1.0	-4.9	-1.7	1.7	-17.2	-0.1	-17.1	-3.7	-36.9
2009	15.2	-2.1	5.0	5.2	9.0	-1.1	10.1	0.1	1.0	2.3	6.2	5.0	70.7
<i>Index</i>	15.3	-4.2	0.7	11.0	9.3	-1.7	12.4	-3.2	4.8	2.9	6.4	6.6	76.4
2010	0.7	5.4	2.0	2.4	-4.5	5.1	5.8	-1.6	5.0	2.0	3.2	2.7	31.7
<i>Index</i>	0.6	4.6	2.9	3.4	-5.4	5.6	7.5	-2.5	6.1	5.4	1.9	1.7	35.9
2011	1.2	5.1	0.0	2.6	-4.3	1.8	-2.4	-0.4	-3.3	9.1	0.1	6.8	16.4
<i>Index</i>	3.0	3.5	-0.6	3.3	-5.0	1.1	-1.9	-1.1	-4.1	10.3	-0.2	5.8	13.9
2012	1.6	5.2	-3.7	0.8									3.8
<i>Index</i>	1.9	4.2	-4.0	2.2									4.3

Returns do not include cash balances prior to May 2010. The Index is the Alerian MLP Index, AMZX. Returns are net of fees. Past performance is not indicative of future returns.

SL Advisors offers separately managed accounts for individuals, family offices and institutions across various investment strategies. Client assets are held with Charles Schwab, the largest provider of custody services in the U.S. with assets of \$1.36 trillion and 7.9 million individual accounts (as of June 30, 2010). Client portfolios are completely transparent via Schwab's extensive website which provides real-time access to accounts and all supporting information. Detailed monthly statements are mailed directly to clients from Schwab.

SL Advisors Hedged Dividend Capture Strategy

An alternative to bonds, this strategy utilizes stocks of stable companies with high dividend yields to generate income with capital appreciation by investing in a diverse, unleveraged, hedged portfolio of U.S. equities. Companies are selected that possess a history of steady earnings growth, attractive dividend yields and are less volatile than the overall market. The long positions are hedged with a short S&P500 position with the objective of making the portfolio beta neutral while still maintaining a net long equity exposure. Historically this strategy has exhibited monthly swings comparable to corporate bonds, and given the relative attractiveness of equities compared with investment grade bonds it has a more attractive return outlook. This strategy may be considered as a substitute for a portion of an investor's fixed income allocation.

SL Advisors Deep Value Equity Strategy

A portfolio of undervalued stocks of high quality businesses that aims to outperform the S&P500. Investments are in listed U.S. equities trading significantly below the intrinsic value of the underlying enterprise. Potential investments are identified both qualitatively and quantitatively following which detailed research is performed to assess fundamental value. Desired characteristics of businesses include pricing power, low leverage, low costs of production, and attractive valuation. Valuation is defined to us foremost as the net present value of cash one can extract from proportional ownership of the business, then relatively using peer multiples and finally liquidation value. The portfolio is reassessed constantly and all holdings are rated for return potential and risk against their peer group to rebalance into the most attractive opportunities. This strategy is part of the equity allocation for balanced accounts for individuals, and is also appropriate as an alpha seeking equity strategy for institutional accounts.

SL Advisors MLP Strategy

This portfolio consists of 10-15 investments in Master Limited Partnerships (MLPs) to receive a healthy and growing tax deferred income stream. MLPs are publicly traded interests in energy infrastructure and related assets. They represent direct proportional ownership stakes in the underlying assets rather than securities in a corporation. Historically they have paid regular distributions which have grown with the U.S. economy, and as such they can be suitable for investors seeking income generating investments with a tolerance for equity market exposure. The strategy engages in low turnover so as to minimize transaction costs and benefit from the income tax deferral features of the asset class. MLPs are appropriate for high net worth investors comfortable with receiving a K-1 for each investment rather than a 1099. SL Advisors does not provide tax advice.

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SL Advisors regularly publishes investment research on Seeking Alpha's website. Click on the image to read more, or go to <http://seekingalpha.com/author/sl-advisors>.

The Hedge Fund Mirage, my new book, is now available. Go to:
<http://www.hedgefundmirage.com>

Our blog, *In Pursuit of Value*, is at: <http://inpursuitofvalue.wordpress.com>

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