

Schedule F of Form ADV

Continuation Sheet for Form ADV **Part II**

Applicant: Crawford Investment Counsel, Inc.	SEC File Number: 801- 15563	Date: 03/25/2010
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(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Crawford Investment Counsel, Inc.	IRS Empl. Ident. No.: 58-1408870
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1.D.	<p>Clients will receive continuous review, management, and supervision of the assets of the account. For new clients the basic annual fee schedules are:</p> <p style="text-align: center;"><u>BALANCED AND COMMON STOCK ACCOUNTS</u></p> <p>0.750% on the first ----- \$5 Million 0.500% thereafter</p> <p>Minimum Annual Fee: \$25,000</p> <p style="text-align: center;"><u>FIXED INCOME ONLY ACCOUNTS</u></p> <p>0.400% on the first ---- \$5 Million 0.350% on the next ---- \$5 Million 0.300% thereafter</p> <p>Minimum Annual Fee: \$10,000</p> <p>The annual fee rate is applied to the total market value of the portfolio and billed quarterly in advance.</p> <p>Under certain circumstances fees may be negotiated. Such circumstances could include a substantially larger than average account or a portfolio with a large concentration in one security.</p> <p>The contract may be terminated by either CIC or the client upon written notice and fee refunds will be prorated to the date of cancellation.</p> <p>The clients' investment advisory fee may be deducted directly from the clients' custodial account with a copy of the quarterly fee statement being sent to the client as well.</p> <p><u>Wrap Fee Programs</u> CIC participates in several wrap-fee programs sponsored by unaffiliated broker-dealers. The annual fee paid by a client to the broker-dealer sponsoring a wrap fee program will typically range from 1.00% to 2.50% of the assets invested in the program. In deciding whether to invest through a particular program, the client should consider such factors as the amount of the wrap fee, the amount of portfolio activity in the client's account, the value of the custodial and other services that are provided under the program, and other factors. The client should also realize that the final wrap fee may exceed the aggregate cost of such services if the services were to be provided separately and if CIC or the other investment advisers were free to negotiate commissions and seek best price and execution for the client's account.</p>
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	<p>The sponsors and programs are as follows:</p> <table style="margin-left: 40px;"> <tr> <td>IJL-Wachovia</td> <td>Network Program</td> </tr> <tr> <td>UBS</td> <td>MAC Program</td> </tr> <tr> <td>ADVISORport</td> <td></td> </tr> <tr> <td>SunTrust Securities</td> <td>AMC Premier, Pinnacle</td> </tr> <tr> <td>Scott & Stringfellow</td> <td>Select Advisory Services</td> </tr> <tr> <td>Hilliard & Lyon</td> <td>Advantaged Asset Account</td> </tr> <tr> <td>Stern, Agee & Leach</td> <td>WealthCore</td> </tr> <tr> <td>Morgan Keegan</td> <td>Preferred Managers Program</td> </tr> <tr> <td>Morgan Stanley Smith Barney Consulting Grp</td> <td>Fiduciary Services</td> </tr> <tr> <td>MidSouth Capital, Inc.</td> <td>Unbundled Managed Account Solutions</td> </tr> </table>	IJL-Wachovia	Network Program	UBS	MAC Program	ADVISORport		SunTrust Securities	AMC Premier, Pinnacle	Scott & Stringfellow	Select Advisory Services	Hilliard & Lyon	Advantaged Asset Account	Stern, Agee & Leach	WealthCore	Morgan Keegan	Preferred Managers Program	Morgan Stanley Smith Barney Consulting Grp	Fiduciary Services	MidSouth Capital, Inc.	Unbundled Managed Account Solutions
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MidSouth Capital, Inc.	Unbundled Managed Account Solutions																				
2.C.	CIC serves as investment adviser and receives a management fee for providing advice to the Crawford Dividend Growth Fund (CDGIX and CDGCX). CIC may recommend the Fund to its private advisory clients. CIC will waive the fees typically charged to its private clients with respect to such clients' assets invested in the Fund.																				
2.G.	<p>Clients other than those listed under item 2. include Municipalities and Taft Hartley plans.</p> <p>CIC has entered into sub-advisory agreements with broker/dealers, corporations and/or other investment advisory firms.</p>																				
6.	<p>John H. Crawford, III was born January 21, 1941, was graduated from the University of Georgia with a B.A. in 1962 and Drew University with a M.Div. in 1965. He was President of Crawford Investment Counsel, Inc. from 1980-2008 and is currently Chief Investment Officer.</p> <p>Milton W. Williams, III was born October 22, 1959, was graduated from The Citadel with a B.S. in 1981. He has been Senior Vice President of Crawford Investment Counsel, Inc. since October 1994 and participates in the firm's equity participation program. From 1993 to 1994, Mr. Williams was a Vice President and Senior Portfolio Manager with the NationsBank Investment Management Group. From 1988 to 1993 Mr. Williams was a Vice President and Portfolio Manager in the Trust and Investment Management Department of Trust Company of Georgia.</p> <p>John H. Crawford, IV, CFA was born December 6, 1965, was graduated from the University of Georgia with a B.B.A. in 1988 and Georgia State University with a Master of Finance in 1992. He is a Chartered Financial Analyst. He has been with Crawford Investment Counsel, Inc. since 1990. Mr. Crawford is Director on Investments and a Portfolio Manager/Analyst. From 1988 to 1990, Mr. Crawford worked at Merrill Lynch Capital Markets.</p> <p>David B. Crawford, CFA was born July 3, 1968, was graduated from Denison University with a BA degree in Economics and Georgia State University with a Master of Finance in 1997. He is a Chartered Financial Analyst. He has been with Crawford Investment Counsel, Inc. since 1992. Mr. Crawford is President and a Portfolio Manager/Analyst and Chief Compliance Officer</p>																				

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	<p>for the firm. From 1991 to 1992, Mr. Crawford worked for Federal Home Loan Bank.</p> <p>Jonathan R. Morgan, born February 15, 1957, was graduated from Miami University, Oxford, Ohio with a B.S. in Economics and Finance in 1979. He is the CIO and portfolio manager for the firms Municipal Bond Management Platform. Mr. Morgan has been involved with the Municipal Bond market for the past 25 years. Prior to joining Crawford, he co-founded MPM, Inc.; a fee based advisory business dedicated to the management of municipal bonds. Mr. Morgan was employed by Bear Stearns & Co., Inc. for nearly 20 years as a municipal bond trader and municipal institutional salesperson.</p> <p>Debra A. DiSimone was born May 7, 1969 and graduated from Villanova University in 1992 with a BS degree in Business Administration. She has been employed with Crawford Investment Counsel, Inc since 2003 as a Portfolio Manager/Trader. In 2002 she was employed with a small Hedge Fund in Atlanta. From 1997-2001 Ms. DiSimone was an Assistant Vice President with Merrill Lynch on the Institutional Equity trading sales desk and covered the Southeast. From 1995-1997 she was employed with INVESCO Capital Management as a Portfolio Administrator and prior to that started her career in 1992 with SunBank Capital Management in Orlando Florida.</p> <p>Brandon M. Denihan was born March 16, 1978, and graduated from Wake Forest University in 2000 with a BS degree in Mathematics, Minor in Computer Science. He has been with Crawford Investment Counsel, Inc. since 2004 as a Portfolio Manager/New Business Development. In 2003 Mr. Denihan was employed by Wells Real Estate Funds as a Key Accounts Representative. From 2000 to 2003 Mr. Denihan was a Product Manager of Foreign and Global Funds for Evergreen Investments.</p> <p>Alan W. Kirchner was born June 17, 1959 and graduated from Westminster College in 1981 with a BA degree in Economics and Business Administration. Mr. Kirchner joined Crawford Investment Counsel, Inc. in 2008 as a Portfolio Manager. In 2007 Mr., Kirchner was President of Kirchner Advisory, LLC. From 2005 to 2007 Mr., Kirchner was a Financial Advisor with Merrill Lynch. From 2003 to 2005 Mr., Kirchner was a Regional Representative for Quest Capital Strategies, Inc.</p> <p>Paul C. Becht, CFA was born December 24, 1957, was graduated from Washington & Lee University with a BS degree in Business in 1980. He is a Chartered Financial Analyst. He has been with Crawford Investment Counsel, Inc. since 1998 as a research analyst and participates in the firm's equity participation program. From 1993 to 1998, Mr. Becht was an analyst for Trusco Capital Management in Atlanta, Georgia. From 1991 to 1993 Mr. Becht was an analyst for Signet Trust Co. in Richmond, Virginia, and from 1986 to 1991 Mr. Becht was an analyst for Sovran Bank/C&S Sovran Bank/NationsBank in Richmond, Virginia.</p> <p>Boris Kuzmin, CFA was born December 11, 1976, was graduated from the Russian Academy of Economics with a BS degree in Economics in 1997 and Emory University with a MBA in 2004. He is a Chartered Financial Analyst. He has been with Crawford Investment Counsel, Inc. since 2004 as an assistant portfolio manager and member of the research team. Previously, Mr. Kuzmin was an intern analyst for Emory Investment Management (2003-2004); an Applications Developer for LandAmerica Financial Group, Inc. (2001– 2002); and a Programmer-Analyst for Interland, Inc. (2000-2001).</p>
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	<p>David P. Gilmore, CFA, was born November 11, 1970, was graduated from Liberty University in 1991 with a B. S. in Accounting and The Darden Graduate School of Business Administration, University of Virginia with an MBA in 1997. He is a Chartered Financial Analyst. Mr. Gilmore joined Crawford Investment Counsel, Inc. as a Senior Equity Research Analyst in October 2009. From 1997 to 2009, Mr. Gilmore was an Equity Analyst then Portfolio Manager for Federated Investors. From 1992 to 1995, Mr. Gilmore was an Associate then Senior Associate for Coopers & Lybrand LLP.</p> <p>Thomas J. Buehler, CFA was born December 27, 1976, was graduated from the University of Dayton with a B.S. in Finance in 1999 and the University of Notre Dame with an MBA in 2005. He is a Chartered Financial Analyst. He has been with Crawford Investment Counsel, Inc. since 2005. Mr. Buehler is a Portfolio Manager and a member of the firm's investment committee. From 1999-2003, Mr. Buehler worked at Caldwell & Orkin, Inc.</p> <p>Leslie M. Krone was born June 19, 1968, was graduated from the University of Dayton with a B.S in 1990. She has been with Crawford Investment Counsel, Inc. since 2005. Ms. Krone is a bond trader and a Portfolio Manager. From 2003-2005, Ms. Krone was a taxable trader for Trusco Capital Management in Atlanta, GA and from 1990-2003 was a tax-free trader with SunTrust Banks in Atlanta, GA.</p> <p>Geoffrey S. DeLong, CFA was born September 30, 1969, was graduated from Wofford College with a B.A. in Finance in 1991 and the University of South Carolina with an MBA in 1996. He is a Chartered Financial Analyst. He joined Crawford Investment Counsel, Inc. as a Bond Portfolio Manager in 2008. From 1996 to 2008 he was Director of Institutional Fixed Income Sales for SunTrust Robinson Humphrey. From 1991 to 1994 he was a Financial Consultant with Smith Barney.</p>
9.D.	<p>CIC established and may recommend to clients for investment a tax-exempt pooled trust designed to permit qualified employee benefit plans and individual retirement accounts to commingle all or a portion of their assets for investment and diversification. CIC serves as Investment Manager.</p> <p>CIC serves as investment adviser and receives a management fee for providing advice to the Crawford Dividend Growth Fund (CDGIX). CIC may recommend the Fund to its private advisory clients. CIC will waive the fees typically charged to its private clients with respect to such clients' assets invested in the Fund.</p>
9.E.	<p>CIC and related persons may from time to time purchase for their own account securities recommended by CIC for the purchase and/or sale by the client. CIC has procedures in place to protect the interests of their clients. Records of all security transactions by CIC and related persons will be maintained for at least five years.</p>
10.	<p>The minimum portfolio size acceptable for new balanced and common stock accounts is \$1 million. The minimum portfolio size for a fixed income account is \$3 million. This is flexible, however, and may be waived in cases such as an existing client having some relationship to the prospective client. There are no minimum asset requirements for existing clients. The minimum</p>

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12.	<p>annual fee for equity and balanced accounts is \$25,000.</p> <p>The client and CIC agree at the onset of the relationship as to the investment objectives of the portfolio. These would generally include statements limiting the level of risk in the portfolio. To the extent that an issue would fall outside of the objectives of the client or would entail undue risk, CIC would avoid such issues.</p> <p>Clients of CIC have the ability to direct their account trades to a specific broker-dealer. In such cases, CIC does not negotiate commissions for those accounts with directed brokerage. When a client directs trades to a specific broker-dealer, it is the client's responsibility to negotiate the commission schedule. Those accounts might pay higher transactions costs.</p> <p>When CIC has discretion as to the placement of brokerage, this determination is based upon four factors: (1) where the best execution (price) is likely to be obtained. This is a function of past experience with individual firms, particular brokers and traders, and the security in question; (2) a brokerage firm's research and investment ideas that directly impact a client's portfolio; (3) price (the amount of commission paid). All trades are negotiated to the appropriate level based on the size of the trade and its complexity to execute and (4) the operational aspects of brokerage firms' back office (will the client receive payment of securities on a timely basis), and custodian or other administrative service. Because of these considerations CIC may pay a brokerage commission in excess of that which another broker might have charged for having effected the same transaction in recognition of the value of brokerage or research services provided by the broker. Research services furnished by a broker through whom CIC effects securities transactions may be used in servicing all of CIC's accounts and not all of such services may be used by CIC in connection with accounts which pay the brokers providing such services.</p> <p>Soft Dollar Commission Policy</p> <p>Consistent with its discretionary authority to select particular brokers, the firm does utilize some commission dollars in order to obtain services that directly benefit our clients' portfolios, such as research products. Soft dollar executions are done through reputable brokers only and only done in cases where execution is not sacrificed. The brokers provide low commission rates. The Compliance Department approves and signs off on soft dollar arrangements annually and creates a master brokerage allocation budget with the trader (including third-party soft dollar arrangements). Monthly reports are compiled to document soft dollar activities.</p> <p>Examples of research services purchased are: written market publications for investment professionals dealing generally with market information, asset allocation, and information relating to selected specific companies and securities; a database of fundamental data on over 7,000 securities, and Bloomberg which provides real-time and historic data, news, analytics, pricing, trading and communication tools. An example of one product used on a mixed use basis is the firm's portfolio accounting/analysis system. This product is used for analyzing portfolios, the management of portfolios and viewing portfolios versus models as well as benchmarks which allow the firm to classify this as a research tool.</p>
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13.A.	Investment decisions for each client are made independently for each client. Nevertheless, it sometimes happens that the same security may be appropriate for more than one client, so that the same security may be purchased or sold simultaneously for more than one client's account. When two or more clients are simultaneously engaged in the purchase or sale of the same security, the prices and amounts are allocated in accordance with procedures believed to be appropriate for each client. In most cases, the transaction will be averaged as to price with transaction costs shared pro rata based on each client's participation in the transaction. Available investments are allocated as to amount as nearly as practicable in proportion to the amounts desired to be purchased or sold for each such client. If an aggregated transaction is not filled completely, CIC will allocate the partially filled transaction on an equitable basis, across all accounts except in instances where this form of allocation results in odd lot shares or unreasonably allocated amounts. Under these circumstances, we will randomly/manually allocate the executed shares.
13.B.	CIC will aggregate transactions only if it believes that aggregation is in the best interests of the applicable clients, is consistent with its duty to seek best execution for its clients, and is consistent with the terms of its investment advisory agreement with each client for whom transactions are being aggregated. Nevertheless, the system employed by CIC may have a detrimental effect on the price or value of the security as far as each client is concerned. In other cases, however, the ability of the clients to participate in volume transactions will produce better execution prices for the funds.
Miscellaneous	See Item 12 above. CIC has entered into written solicitation agreements and may enter into additional solicitation agreements under Rule 206 (4)-3 of the Advisors Act. These agreements are fully disclosed in writing to all entities solicited and allows for the sharing of fees. The fee to the client is not increased by the agreement. <u>Privacy Disclosure Notice</u> Crawford Investment Counsel, Inc. ("CIC") collects nonpublic personal information about its clients from the following sources: <ul style="list-style-type: none"> • Information we receive from the client on applications or other forms; and • Information about the clients' transactions with us or others <p>We do not disclose any nonpublic personal information about our clients to anyone, except as permitted by law or specifically permitted by the client. If the client decides to close their account(s) or become an inactive customer, we will adhere to the privacy policies and practices as described in this notice. Every client also has an opportunity to opt out.</p> <p>CIC restricts access to its clients' personal and account information to those employees who need to know that information to provide products or services to the client. CIC maintains physical, electronic, and procedural safeguards to guard its clients' nonpublic personal information.</p>

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	<p>All information about our clients, their investments, fee arrangements, and their personal lives is confidential to the firm. The only time the information is shared with others is when directed to do so by the client.</p> <p>Violation of client confidentiality is not tolerated and strictly enforced by the firm with its employees.</p> <p>Client Information Collected: Client Name Address, Phone Numbers, E-mail Address Occupation & Employer Social Security Number Date of Birth Portfolio Values & Holdings Transaction History Account Numbers</p> <p>Client information is disclosed to the following as permitted under Section 502(E)(1) by the Gramm-Leach-Bliley Act: Broker Dealers in the course of executing transactions Custodians (CIC does not custody assets for its clients) Performance Auditor – Client names and account values may be divulged Portfolio Accounting Systems – as the vendor they may have access to our portfolio accounting systems Proxy voting service Email retention service The firm’s attorney SEC auditors The firm’s insurance company & agent Computer technicians Class action filing service</p> <p>Code of Ethics CIC has an established Code of Ethics which is provided to all employees at the time of their hiring and on an annual basis. The purpose of which is to govern the personal securities trades of employees whose personal interests, in certain circumstances, may conflict with those of the firm and its clients. While the firm has full confidence in the integrity of all of its employees, officers and directors, it recognizes that certain of these persons have or may have knowledge of present or future client transactions and, in certain circumstances, the power to influence transactions made by or for clients. If such individuals engage in personal transactions in securities that are eligible for investment by clients, these individuals could be in the position where there personal interest may conflict with the interests of clients. Employees of the firm owe a fiduciary duty its clients. This duty includes the obligation to conduct their personal securities transactions in a manner that does not interfere with the transactions of any client or otherwise to take unfair advantage of their relationship with clients. Employees have a duty at all times to place the interests of clients first, to conduct all</p>
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	<p>personal securities transactions in a manner consistent with the firm's Code of Ethics and in such a manner to avoid any actual or potential conflict or abuse of a position of trust and responsibility.</p> <p>A copy of the firm's Code of Ethics is available upon request.</p> <p>The firm's Chief Compliance Officer is David B. Crawford and Compliance Officer is Lisa Najdowski.</p> <p><u>Proxy Voting Policy</u></p> <p>CIC recognizes its responsibility as fiduciary of its clients' portfolios. As fiduciary, it is our policy to act solely in the best interests of our clients and their beneficiaries. In matters of proxy voting, we take several steps to ensure that we are acting in such best interests:</p> <ul style="list-style-type: none"> • Matters are generally voted with management. • If, through research, the firm determines that management is not acting in the best interests of shareholders, the stock is reviewed by the Investment Committee for possible sale. • Clients may request documentation indicating how specific proxies were voted on their behalf at any time from the firm. • To ensure that all proxies are voted in a timely manner, the firm utilizes the services of Broadridge. The website is checked on a weekly basis for pending proxies (daily during proxy season). Historical records of the proxies voted are maintained at Broadridge. The bulk of the proxies are handled in this manner. For the custodians that do not have the capability to electronically send the proxies to Broadridge and only mail hard copies, each hard copy received is voted on Proxyvote.com and a confirmation is requested and filed with the original proxy ballot. • Disclosure is made to all clients regarding the firm's duties to vote proxies, handle corporate reorganization and corporate actions in the firm's Investment Advisory Agreement with the client and in the firm's disclosure brochure (ADV II). • The firm maintains extensive research files on all companies owned. <p>Clients may request documentation on how specific proxies were voted on their behalf at any time from Lisa Najdowski at 770-859-0045.</p>
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