

FORM ADV

Uniform Application for Investment Adviser Registration

Part II - Page 1

| OMB APPROVAL | |
|---------------------------------------------------------|---------------|
| OMB Number: | 3235-0049 |
| Expires: | July 31, 2008 |
| Estimated average burden hours per response. | 9.402 |

| | | | | | |
|-----------------------------|---------------------|--------|---------|------------|-------------------------------------|
| Name of Investment Adviser: | | | | | |
| Address: | (Number and Street) | (City) | (State) | (Zip Code) | Area Code: Telephone number: () |

**This part of Form ADV gives information about the investment adviser and its business for the use of clients.
The information has not been approved or verified by any governmental authority.**

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(Schedules A, B, C, D, and E are included with Part I of this Form, for the use of regulatory bodies, and are not distributed to clients.)

Potential persons who are to respond to the collection of information contained in this form are not required to respond unless the form displays a currently valid OMB control number.

1. A. Advisory Services and Fees. (check the applicable boxes) For each type of service provided, state the approximate % of total advisory billings from that service. (See instruction below.)

Applicant:

- | | | | |
|--------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------|-------|---|
| <input type="checkbox"/> | (1) Provides investment supervisory services | _____ | % |
| <input type="checkbox"/> | (2) Manages investment advisory accounts not involving investment supervisory services | _____ | % |
| <input type="checkbox"/> | (3) Furnishes investment advice through consultations not included in either service described above | _____ | % |
| <input type="checkbox"/> | (4) Issues periodicals about securities by subscription | _____ | % |
| <input type="checkbox"/> | (5) Issues special reports about securities not included in any service described above | _____ | % |
| <input type="checkbox"/> | (6) Issues, not as part of any service described above, any charts, graphs, formulas, or other devices which clients may use to evaluate securities | _____ | % |
| <input type="checkbox"/> | (7) On more than an occasional basis, furnishes advice to clients on matters not involving securities | _____ | % |
| <input type="checkbox"/> | (8) Provides a timing service | _____ | % |
| <input type="checkbox"/> | (9) Furnishes advice about securities in any manner not described above | _____ | % |

(Percentages should be based on applicant's last fiscal year. If applicant has not completed its first fiscal year, provide estimates of advisory billings for that year and state that the percentages are estimates.)

B. Does applicant call any of the services it checked above financial planning or some similar term? Yes No

C. Applicant offers investment advisory services for: (check all that apply)

- | | | | |
|--------------------------|--------------------------------------------------|--------------------------|-----------------------|
| <input type="checkbox"/> | (1) A percentage of assets under management | <input type="checkbox"/> | (4) Subscription fees |
| <input type="checkbox"/> | (2) Hourly charges | <input type="checkbox"/> | (5) Commissions |
| <input type="checkbox"/> | (3) Fixed fees (not including subscription fees) | <input type="checkbox"/> | (6) Other |

D. For each checked box in A above, describe on Schedule F:

- the services provided, including the name of any publication or report issued by the adviser on a subscription basis or for a fee
- applicant's basic fee schedule, how fees are charged and whether its fees are negotiable
- when compensation is payable, and if compensation is payable before service is provided, how a client may get a refund or may terminate an investment advisory contract before its expiration date

2. Types of clients - Applicant generally provides investment advice to: (check those that apply)

- | | | | |
|--------------------------|-------------------------------------|--------------------------|--------------------------------------------------------------------|
| <input type="checkbox"/> | A. Individuals | <input type="checkbox"/> | E. Trusts, estates, or charitable organizations |
| <input type="checkbox"/> | B. Banks or thrift institutions | <input type="checkbox"/> | F. Corporations or business entities other than those listed above |
| <input type="checkbox"/> | C. Investment companies | <input type="checkbox"/> | G. Other (describe on Schedule F) |
| <input type="checkbox"/> | D. Pension and profit sharing plans | | |

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

3. Types of Investments. Applicant offers advice on the following: (check those that apply)

- | | |
|-------------------------------------------------------------------------------------|---------------------------------------------------------------------|
| <input type="checkbox"/> A. Equity securities | <input type="checkbox"/> H. United States government securities |
| <input type="checkbox"/> (1) exchange-listed securities | <input type="checkbox"/> I. Options contracts on: |
| <input type="checkbox"/> (2) securities traded over-the-counter | <input type="checkbox"/> (1) securities |
| <input type="checkbox"/> (3) foreign issuers | <input type="checkbox"/> (2) commodities |
| <input type="checkbox"/> B. Warrants | <input type="checkbox"/> J. Futures contracts on: |
| <input type="checkbox"/> C. Corporate debt securities (other than commercial paper) | <input type="checkbox"/> (1) tangibles |
| <input type="checkbox"/> D. Commercial paper | <input type="checkbox"/> (2) intangibles |
| <input type="checkbox"/> E. Certificates of deposit | <input type="checkbox"/> K. Interests in partnerships investing in: |
| <input type="checkbox"/> F. Municipal securities | <input type="checkbox"/> (1) real estate |
| <input type="checkbox"/> G. Investment company securities: | <input type="checkbox"/> (2) oil and gas interests |
| <input type="checkbox"/> (1) variable life insurance | <input type="checkbox"/> (3) other (explain on Schedule F) |
| <input type="checkbox"/> (2) variable annuities | <input type="checkbox"/> L. Other (explain on Schedule F) |
| <input type="checkbox"/> (3) mutual fund shares | |

4. Methods of Analysis, Sources of Information, and Investment Strategies.

A. Applicant's security analysis methods include: (check those that apply)

- | | |
|------------------------------------------|------------------------------------------------------------|
| (1) <input type="checkbox"/> Charting | (4) <input type="checkbox"/> Cyclical |
| (2) <input type="checkbox"/> Fundamental | (5) <input type="checkbox"/> Other (explain on Schedule F) |
| (3) <input type="checkbox"/> Technical | |

B. The main sources of information applicant uses include: (check those that apply)

- | | |
|--------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------|
| (1) <input type="checkbox"/> Financial newspapers and magazines | (5) <input type="checkbox"/> Timing services |
| (2) <input type="checkbox"/> Inspections of corporate activities | (6) <input type="checkbox"/> Annual reports, prospectuses, filings with the Securities and Exchange Commission |
| (3) <input type="checkbox"/> Research materials prepared by others | (7) <input type="checkbox"/> Company press releases |
| (4) <input type="checkbox"/> Corporate rating services | (8) <input type="checkbox"/> Other (explain on Schedule F) |

C. The investment strategies used to implement any investment advice given to clients include: (check those that apply)

- | | |
|---------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------|
| (1) <input type="checkbox"/> Long term purchases (securities held at least a year) | (5) <input type="checkbox"/> Margin transactions |
| (2) <input type="checkbox"/> Short term purchases (securities sold within a year) | (6) <input type="checkbox"/> Option writing, including covered options, uncovered options or spreading strategies |
| (3) <input type="checkbox"/> Trading (securities sold within 30 days) | (7) <input type="checkbox"/> Other (explain on Schedule F) |
| (4) <input type="checkbox"/> Short sales | |

5. Education and Business Standards.

Are there any general standards of education or business experience that applicant requires of those involved in determining or giving investment advice to clients? Yes No
(If yes, describe these standards on Schedule F.)

6. Education and Business Background.

For:

- each member of the investment committee or group that determines general investment advice to be given to clients, or
- if the applicant has no investment committee or group, each individual who determines general investment advice given to clients (if more than five, respond only for their supervisors)
- each principal executive officer of applicant or each person with similar status or performing similar functions.

On Schedule F, give the:

- name
- year of birth
- formal education after high school
- business background for the preceding five years

7. Other Business Activities. (check those that apply)

- A. Applicant is actively engaged in a business other than giving investment advice.
- B. Applicant sells products or services other than investment advice to clients.
- C. The principal business of applicant or its principal executive officers involves something other than providing investment advice.

(For each checked box describe the other activities, including the time spent on them, on Schedule F.)

8. Other Financial Industry Activities or Affiliations. (check those that apply)

- A. Applicant is registered (or has an application pending) as a securities broker-dealer.
- B. Applicant is registered (or has an application pending) as a futures commission merchant, commodity pool operator or commodity trading adviser.
- C. Applicant has arrangements that are material to its advisory business or its clients with a related person who is a:
 - (1) broker-dealer
 - (2) investment company
 - (3) other investment adviser
 - (4) financial planning firm
 - (5) commodity pool operator, commodity trading adviser or futures commission merchant
 - (6) banking or thrift institution
 - (7) accounting firm
 - (8) law firm
 - (9) insurance company or agency
 - (10) pension consultant
 - (11) real estate broker or dealer
 - (12) entity that creates or packages limited partnerships

(For each checked box in C, on Schedule F identify the related person and describe the relationship and the arrangements.)

- D. Is applicant or a related person a general partner in any partnership in which clients are solicited to invest? . . . Yes No

(If yes, describe on Schedule F the partnerships and what they invest in.)

9. Participation or Interest in Client Transactions.

Applicant or a related person: (check those that apply)

- A. As principal, buys securities for itself from or sells securities it owns to any client.
- B. As broker or agent effects securities transactions for compensation for any client.
- C. As broker or agent for any person other than a client effects transactions in which client securities are sold to or bought from a brokerage customer.
- D. Recommends to clients that they buy or sell securities or investment products in which the applicant or a related person has some financial interest.
- E. Buys or sells for itself securities that it also recommends to clients.

(For each box checked, describe on Schedule F when the applicant or a related person engages in these transactions and what restrictions, internal procedures, or disclosures are used for conflicts of interest in those transactions.)

Describe, on Schedule F, your code of ethics, and state that you will provide a copy of your code of ethics to any client or prospective client upon request.

- 10. Conditions for Managing Accounts.** Does the applicant provide investment supervisory services, manage investment advisory accounts or hold itself out as providing financial planning or some similarly termed services *and* impose a minimum dollar value of assets or other conditions for starting or maintaining an account? Yes No
-

(If yes, describe on Schedule F)

11. Review of Accounts. If applicant provides investment supervisory services, manages investment advisory accounts, or holds itself out as providing financial planning or some similarly termed services:

A. Describe below the reviews and reviewers of the accounts. **For reviews**, include their frequency, different levels, and triggering factors. **For reviewers**, include the number of reviewers, their titles and functions, instructions they receive from applicant on performing reviews, and number of accounts assigned each.

B. Describe below the nature and frequency of regular reports to clients on their accounts.

12. Investment or Brokerage Discretion.

- A. Does applicant or any related person have authority to determine, without obtaining specific client consent, the:
- | | | |
|----------------------------------------------------------|--------------------------|--------------------------|
| (1) securities to be bought or sold? | Yes | No |
| | <input type="checkbox"/> | <input type="checkbox"/> |
| (2) amount of the securities to be bought or sold? | Yes | No |
| | <input type="checkbox"/> | <input type="checkbox"/> |
| (3) broker or dealer to be used? | Yes | No |
| | <input type="checkbox"/> | <input type="checkbox"/> |
| (4) commission rates paid? | Yes | No |
| | <input type="checkbox"/> | <input type="checkbox"/> |

- B. Does applicant or a related person suggest brokers to clients? Yes No

For each yes answer to A describe on Schedule F any limitations on the authority. For each yes to A(3), A(4) or B, describe on Schedule F the factors considered in selecting brokers and determining the reasonableness of their commissions. If the value of products, research and services given to the applicant or a related person is a factor, describe:

- the products, research and services
- whether clients may pay commissions higher than those obtainable from other brokers in return for those products and services
- whether research is used to service all of applicant's accounts or just those accounts paying for it; and
- any procedures the applicant used during the last fiscal year to direct client transactions to a particular broker in return for product and research services received.

13. Additional Compensation.

Does the applicant or a related person have any arrangements, oral or in writing, where it:

- A. is paid cash by or receives some economic benefit (including commissions, equipment or non-research services) from a non-client in connection with giving advice to clients? Yes No
- B. directly or indirectly compensates any person for client referrals? Yes No

(For each yes, describe the arrangements on Schedule F.)

14. Balance Sheet. Applicant must provide a balance sheet for the most recent fiscal year on Schedule G if applicant:

- has custody of client funds or securities (unless applicant is registered or registering only with the Securities and Exchange Commission); or
 - requires prepayment of more than \$500 in fees per client and 6 or more months in advance
- Has applicant provided a Schedule G balance sheet? Yes No

**Schedule G of
Form ADV
Balance Sheet**

Applicant:

SEC File Number:

Date:

801-

(Answers in Response to Form ADV Part II Item 14.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV:

IRS Empl. Ident. No.:

Instructions

1. The balance sheet must be:
 - A. Prepared in accordance with generally accepted accounting principles
 - B. Audited by an independent public accountant
 - C. Accompanied by a note stating the principles used to prepare it, the basis of included securities, and any other explanations required for clarity.
2. Securities included at cost should show their market or fair value parenthetically.
3. Qualifications and any accompanying independent accountant's report must conform to Article 2 of Regulation S-X (17 CFR 210.2-01 et. seq.).
4. Sole proprietor investment advisers:
 - A. Must show investment advisory business assets and liabilities separate from other business and personal assets and liabilities
 - B. May aggregate other business and personal asset and liabilities unless there is an asset deficiency in the total financial position.

Complete amended pages in full, circle amended items and file with execution page (page 1).

DUNLEAVY & COMPANY, P.C.

CERTIFIED PUBLIC ACCOUNTANTS
13116 SOUTH WESTERN AVENUE
BLUE ISLAND, ILLINOIS 60406

(708) 489-1680
Fax: (708) 489-1717

INDEPENDENT AUDITORS' REPORT


Board of Directors
Polar Investment Counsel, Inc.

We have audited the accompanying statement of financial condition of Polar Investment Counsel, Inc. as of June 30, 2006 and the related statements of income, changes in shareholders' equity and cash flows for the year then ended that you are filing pursuant to rule 17a-5 under the Securities and Exchange Act of 1934. These financial statements are the responsibility of the Company's management. Our responsibility is to express an opinion on these financial statements based on our audit.

We conducted our audit in accordance with auditing standards generally accepted in the United States of America. Those standards require that we plan and perform the audit to attain reasonable assurance about whether the financial statements are free of material misstatement. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the financial statements. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation. We believe that our audit provides a reasonable basis for our opinion.

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of Polar Investment Counsel, Inc. as of June 30, 2006 and the results of its operations and its cash flows for the year then ended in conformity with accounting principles generally accepted in the United States of America.

Our audit was conducted for the purpose of forming an opinion on the basic financial statements taken as a whole. The supplemental schedule included with this report is presented for purposes of additional analysis and is not a required part of the basic financial statements, but is supplementary information required by rule 17a-5 of the Securities and Exchange Act of 1934. Such information has been subjected to the auditing procedures applied in the audit of the basic financial statements and in our opinion, is fairly stated in all material respects in relation to the basic financial statements taken as a whole.


DUNLEAVY & COMPANY, P. C.
Certified Public Accountants

Blue Island, Illinois
July 20, 2006

POLAR INVESTMENT COUNSEL, INC.
STATEMENT OF FINANCIAL CONDITION

JUNE 30, 2006

ASSETS

| | |
|--------------------------------|-------------------|
| Cash and cash equivalents | \$ 87,392 |
| Receivable from broker/dealers | <u>217,838</u> |
| | |
| TOTAL ASSETS | <u>\$ 305,230</u> |

LIABILITIES AND SHAREHOLDERS' EQUITY

LIABILITIES

| | |
|-----------------------|-------------------|
| Related party payable | \$ 28,001 |
| Commissions payable | <u>137,400</u> |
| | |
| Total Liabilities | <u>\$ 165,401</u> |

SHAREHOLDERS' EQUITY

| | |
|----------------------------------------------------------------------------------------------|-------------------|
| Common stock, no par value; 9,000 shares authorized, 100 shares issued and outstanding | \$ 25,000 |
| Additional paid in capital | 67,384 |
| Retained earnings | <u>47,445</u> |
| | |
| Total Shareholders' Equity | <u>\$ 139,829</u> |

| | |
|--------------------------------------------|-------------------|
| TOTAL LIABILITIES AND SHAREHOLDERS' EQUITY | <u>\$ 305,230</u> |
|--------------------------------------------|-------------------|

The accompanying notes are an integral part of these financial statements.

Schedule F of Form ADV
Continuation Sheet for Form ADV Part II

| | | |
|----------------------------------------------|--------------------------------|------------------|
| Applicant: Polar Investment Counsel, Inc. | SEC File Number: 801- 64516 | Date: 5-10-07 |
|----------------------------------------------|--------------------------------|------------------|

(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: Polar Investment Counsel, Inc. | | IRS Empl. Ident. No.: 39-1823062 |
|------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|
| Item of Form (identity) | Answer | |
| ADV II Page 2 – 1(A1,3,7) | <p>A1) The firm provides traditional asset management services for which the firm charges 2% of the first \$250,000, 1.5% of the next \$250,000, 1% of the next \$250,000 and a negotiable percentage of amounts in excess of \$1,000,000. Such fees are payable quarterly and in advance. For any brokerage account (as opposed to a mutual fund account), a negotiated commission (clearing fee plus a small markup) is charged. A client may terminate any agreement of this type within five (5) business days of execution of the agreement without penalty and thereafter upon five (5) business days notice and receive a pro-rated refund.</p> <p>A3) The firm occasionally furnishes investment advice through consultations. In these instances a flat fee or hourly rate is negotiated, but no hourly rate shall exceed \$400 per hour plus travel time and expenses. Refunds in this sort of situation are available, but are at the sole discretion of the firm as to the dollar amount or percentage amount.</p> <p>A7) The firm occasionally provides advice on matters not related to securities. The fees and refund policies related to these instances are identical to A3 above.</p> | |
| ADV II Page 3 – 3K3 | 3K3) The Retzer Fund I – a hedge fund and numerous futures funds (pools) most often sold as limited partnerships. The Retzer Fund is not presently available to residents of Colorado. | |
| ADV II Page 4 – 5,6,7,8 | <p>5) The firm requires a minimum of five (5) years of experience in the securities, futures or advisory businesses, or immediate supervision by a registered principal with the requisite experience.</p> <p>6) Background Information:</p> <p>Michael C. Jordan – President, CEO, CCO Year of Birth 1945 <u>Education, Exams & Professional Designations:</u> BA – Business Administration, Indiana University, 1969 NASD Exams: S1,S3,S4,S24,S28,S30,S31,S53,S63 <u>Securities Industry Experience – Continuation since: 1973</u> Polar Investment Counsel, Inc. – Thief River Falls MN – President, CEO, CCO 1995-present</p> <p>Patrick J. Retzer – Principal, OSJ Manager Year of Birth 1957 <u>Education, Exams & Professional Designations:</u> BBA – Business Administration, Major in Accounting, University of WI-Milwaukee, 1979 MS – Management, Major in Taxation, University of WI-Milwaukee 1985 NASD Exams: S3,S4,S7,S24,S28,S31,S53,S63,S65,S53,S63,S65 CPA – 1983 <u>Securities Industry Experience – Continuous since: 1987</u> Polar Investment Counsel, Inc. – Brookfield WI – Principal, OSJ Manager 2002-present Wellington Investment Services Corp – Brookfield WI – Reg Rep 2000-2002 Heartland Advisors – Milwaukee WI – Reg Rep 1987-2000</p> <p>Michael van Maarth – Principal, OSJ Manager Year of Birth 1949 <u>Education, Exams & Professional Designations:</u> Colorado State Univ 1968-1969, Mesa College 1969-1970, Univ of Northern CO 1970-1972 NASD Exams: S7,S24,S31,S63,S65 <u>Securities Industry Experience – Continuous since:1994</u> Polar Investment Counsel, Inc. – Burlington CO – Principal, OSJ Manager 1999-present Edward Jones & Co – Burlington CO – Reg Rep 1994-1999</p> <p>Deborah Pittman – Principal, OSJ Manager Year of Birth 1957 <u>Education, Exams & Professional Designations:</u> NASD Exams: S7,S24,63,S65 <u>Securities Industry Experience – Continuous since:1993</u> Polar Investment Counsel, Inc. – Carbondale IL – Principal, OSJ Manager 2005- present Eagle One Investments – Carbondale IL – Reg Rep 1999-2005 D.R.Hancock & Co – Carbondale IL – Reg Rep 1987-1999</p> <p>Mickey Poole – Principal, OSJ Manager Year of Birth 1957 <u>Education, Exams & Professional Designations:</u> NASD Exams: S4,S7,S24,S63,S65 <u>Securities Industry Experience – Continuous since:1997</u> Polar Investment Counsel, Inc. – Austin TX – Principal, OSJ Manager 2001-present Century Securities Assoc – League City TX – Reg Rep 2000-2001 Prudential Securities Inc – Houston TX – Reg Rep 1997-2000</p> <p>Gary Chester – Principal, OSJ Manager Year of Birth 1952 <u>Education, Exams & Professional Designations:</u> University of IL Urbana IL NASD Exams: S6,S7,S24,S63 <u>Securities Industry Experience – Continuous since:1987</u> Polar Investment Counsel, Inc. – Maumelle AR – Principal, OSJ Manager 1999-present Cambridge Investments – Little Rock AR – Reg Rep 1998-1999 Masters Financial – Little Rock AR – Reg Rep 1990-1998</p> | |

Schedule F of Form ADV
Continuation Sheet for Form ADV Part II

| | | |
|----------------------------------------------|--------------------------------|------------------|
| Applicant: Polar Investment Counsel, Inc. | SEC File Number: 801- 64516 | Date: 5-10-07 |
|----------------------------------------------|--------------------------------|------------------|

(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: Polar Investment Counsel, Inc. | | IRS Empl. Ident. No.: 39-1823062 |
|------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|
| Item of Form (identity) | Answer | |
| | <p>Larry Ladner – Principal, OSJ Manager Year of Birth 1948 <u>Education, Exams & Professional Designations:</u> BBA – Business Administration, Loyola University, 1971 NASD Exams: S1,S4,S7,S15,S24,S63,S65 CPA - 1973 <u>Securities Industry Experience – Continuous since:1978</u> Polar Investment Counsel, Inc. – St. Charles IL – Principal, OSJ Manager 1999-present LaSalle Street Securities – St. Charles IL – Reg Rep 1995-1998</p> | |
| | <p>7) (ABC) The principal business of Polar Investment Counsel, Inc. is that of a broker-dealer (NASD member) and as such sells numerous investment products and services. The firm is also an independent introducing broker registered with the National Futures Association, and is engaged in the purchase and sale of futures contracts and also the sale of pooled futures investment. Finally, the firm is an insurance agency selling various insurance products to its clientele.</p> | |
| | <p>8) (C1) The firm clears much of its securities business with Southwest Securities, Inc. The firm also has a custody arrangement with Southwest Securities, Inc. Southwest Securities, Inc. is another broker dealer registered with the SEC and a NYSE Member firm. (C2) The firm has selling agreements with numerous investment companies. (C3) The firm has arrangements with several other investment advisory firms; among them are ITS Asset Mgmt, MRM Asset Allocation Group, KDC Financial Inc. and Advisors Capital. (C5) The firm has arrangements within excess of 20 commodity trading advisors, pool operators and one independent introducing broker, Zephyr Investment Group, Inc. Among the larger trading advisor relationships are: Campbell & Company and Quadriga. (C9) The firm has relationships with numerous insurance companies chief among them New York Life, Lincoln National, National Life of Vermont and Security Benefit Life. (C12) One of the firm's associates has packaged and syndicated the Retzer Fund I LP. This is a hedge fund and is sold the firm's clientele on a separate subscription basis. (D) Patrick Retzer (a principal of the firm) is the general partner of the Retzer Fund I LP, a hedge fund. This fund may buy and sell (including short sales) any type of securities. This fund is not sold to clients on an investment advisory basis, but rather on a subscription basis.</p> | |
| ADV II Page 5 – 9B, 9D, 9E, | <p>9) (B) Clients who are managed on a fee basis within the confines of a traditional managed account are charged a management fee plus a small clearing and mark-up fee per transaction. Such fees are clearly set forth in the applicable management agreement. See Page 1 1(A). Clients who are managed on a commission basis are charged a negotiable commission. (D) The Retzer Fund I LP. This situation is described in Page 4-8(D). (E) In situations where such conflicts may occur, the firm has instituted trading policies and procedures which are designed to avoid any disadvantages to our clientele.</p> | |
| ADV II Page 5 – Code of Ethics | <p>All firm associates having knowledge of client investments or intended investments are expected to uphold their ethical and fiduciary duty to act in the best interest of their clients according to the firm's Code of Ethics. It is the firm's intent to manage all business with the overriding principle that the client's interests are placed ahead of the firm's or any associate's own investment interests. Any action that violates that principle is a violation of the Code and may be sanctioned as deemed appropriate. A copy of the firm's Code of Ethics is posted on the firm's public website at www.polarinvest1.com or may be obtained in hard copy upon request.</p> | |
| ADV II Page 5 – 10 | <p>10) When the firm prepares a financial plan or gives advisory advice to an individual and no fee is charged for this service, the individual who prepares such plan or gives such advice will receive brokerage commissions through the broker-dealer, Polar Investment Counsel, Inc.</p> | |
| ADV II Page 6 – 12A 1-2, A 4, B | <p>12) (A 1-2) This authority is by limited power of attorney. (A 4) Commissions are negotiated. (B) Administrative costs (including ease of use) and commissions are negotiated.</p> | |
| ADV II Page 6 – 13B | <p>13) (B) The firm may, from time to time, compensate solicitors with whom the firm would have a written contractual agreement with.</p> | |
| Complete amended pages in full, circle amended items and file with execution page (page 1). | | |