

**FORM ADV****Part II - Page 1****Uniform Application for Investment Adviser Registration****OMB APPROVAL**

OMB Number: 3235-0049  
Expires: February 28, 2011  
Estimated average burden  
hours per response. . . . . 4.07

Name of Investment Adviser: VALIC Financial Advisors, Inc.

|                                 |                |           |              |                |                   |
|---------------------------------|----------------|-----------|--------------|----------------|-------------------|
| Address: (Number and Street)    | (City)         | (State)   | (Zip Code)   | Area Code:     | Telephone number: |
| <b>2929 Allen Parkway L4-01</b> | <b>Houston</b> | <b>TX</b> | <b>77019</b> | <b>( 877 )</b> | <b>737-2650</b>   |

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.

**FORM ADV**  
**Part II - Page 2**

Applicant: VALIC Financial Advisors, Inc.

SEC File Number:  
801-54952

Date:  
04/01/2009

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 checked="" type="checkbox"/> | (1) | Provides investment supervisory services .....  | <b>80 %</b> |
| <input checked="" type="checkbox"/> | (2) | Manages investment advisory accounts not involving investment supervisory services .....  | <b>10 %</b> |
| <input type="checkbox"/>            | (3) | Furnishes investment advice through consultations not included in either service described above ....   | <b>%</b>    |
| <input type="checkbox"/>            | (4) | Issues periodicals about securities by subscription .....   | <b>%</b>    |
| <input type="checkbox"/>            | (5) | Issues special reports about securities not included in any service described above .....   | <b>%</b>    |
| <input checked="" 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 ..... | <b>5 %</b>  |
| <input checked="" type="checkbox"/> | (7) | On more than an occasional basis, furnishes advice to clients on matters not involving securities .....   | <b>5 %</b>  |
| <input type="checkbox"/>            | (8) | Provides a timing service .....   | <b>%</b>    |
| <input type="checkbox"/>            | (9) | Furnishes advice about securities in any manner not described above .....   | <b>%</b>    |

(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 checked="" type="checkbox"/> (1) A percentage of assets under management      | <input type="checkbox"/> (4) Subscription fees      |
| <input type="checkbox"/> (2) Hourly charges  | <input checked="" type="checkbox"/> (5) Commissions |
| <input checked="" 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 checked="" type="checkbox"/> A. Individuals                      | <input checked="" 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 checked="" 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).

**FORM ADV**  
**Part II - Page 3**

Applicant: VALIC Financial Advisors, Inc.

SEC File Number:  
**801-54952**

Date:  
**04/01/2009**

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

- |  |  |
|--|--|
| <input type="checkbox"/> A. Equity securities  | <input checked="" type="checkbox"/> H. United States government securities |
| <input checked="" type="checkbox"/> (1) exchange-listed securities                             | <input type="checkbox"/> I. Options contracts on:                          |
| <input checked="" 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 checked="" 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 checked="" type="checkbox"/> E. Certificates of deposit                                 | <input type="checkbox"/> K. Interests in partnerships investing in:        |
| <input checked="" 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 checked="" type="checkbox"/> (1) variable life insurance                                | <input type="checkbox"/> (3) other (explain on Schedule F)                 |
| <input checked="" type="checkbox"/> (2) variable annuities                                     | <input type="checkbox"/> L. Other (explain on Schedule F)                  |
| <input checked="" 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 checked="" type="checkbox"/> Cyclical                      |
| (2) <input checked="" type="checkbox"/> Fundamental | (5) <input checked="" type="checkbox"/> Other (explain on Schedule F) |
| (3) <input checked="" type="checkbox"/> Technical   |   |

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

- |   |   |
|---|---|
| (1) <input checked="" type="checkbox"/> Financial newspapers and magazines    | (5) <input type="checkbox"/> Timing services  |
| (2) <input type="checkbox"/> Inspections of corporate activities              | (6) <input checked="" type="checkbox"/> Annual reports, prospectuses, filings with the Securities and Exchange Commission |
| (3) <input checked="" type="checkbox"/> Research materials prepared by others | (7) <input checked="" type="checkbox"/> Company press releases  |
| (4) <input checked="" 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 checked="" type="checkbox"/> Long term purchases<br>(securities held at least a year) | (5) <input type="checkbox"/> Margin transactions   |
| (2) <input checked="" type="checkbox"/> Short term purchases<br>(securities sold within a year)  | (6) <input type="checkbox"/> Option writing, including covered options,<br>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   |  |

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

**FORM ADV**  
**Part II - Page 4**

Applicant: VALIC Financial Advisors, Inc.

SEC File Number:  
801-54952

Date:  
04/01/2009

**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
- formal education after high school
- year of birth
- 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:
- |  |  |
|--|--|
| <input checked="" type="checkbox"/> (1) broker-dealer  | <input type="checkbox"/> (7) accounting firm                                       |
| <input checked="" type="checkbox"/> (2) investment company   | <input type="checkbox"/> (8) law firm  |
| <input checked="" type="checkbox"/> (3) other investment adviser   | <input checked="" type="checkbox"/> (9) insurance company or agency                |
| <input checked="" type="checkbox"/> (4) financial planning firm  | <input type="checkbox"/> (10) pension consultant                                   |
| <input type="checkbox"/> (5) commodity pool operator, commodity trading adviser or futures commission merchant | <input type="checkbox"/> (11) real estate broker or dealer                         |
| <input type="checkbox"/> (6) banking or thrift institution   | <input type="checkbox"/> (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.)

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

**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.

**See Item 11A on Schedule F**

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

**See Item 11B on Schedule F**

**FORM ADV**  
**Part II - Page 6**

Applicant: VALIC Financial Advisors, Inc.

SEC File Number:  
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Date:  
04/01/2009

**12. Investment or Brokerage Discretion.**

A. Does applicant or any related person have authority to determine, without obtaining specific client consent, the:

- |  | Yes                                 | No                       |
|--|-------------------------------------|--------------------------|
| (1) securities to be bought or sold? .....               | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (2) amount of the securities to be bought or sold? ..... | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (3) broker or dealer to be used? .....                   | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (4) commission rates paid? .....                         | <input checked="" 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<br><input checked="" type="checkbox"/> | No<br><input type="checkbox"/>      |
| B. directly or indirectly compensates any person for client referrals? .....  | <input type="checkbox"/>                   | <input checked="" type="checkbox"/> |

(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 F of  
Form ADV**

**Continuation Sheet for Form ADV Part II**

Applicant: VALIC Financial Advisors,  
Inc.

SEC File Number:

801-54952

Date:

04/01/2009

(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:<br><b>VALIC Financial Advisors, Inc.</b> |   | IRS Empl. Ident. No.:<br><b>76-0519992</b> |
|--|---|--|
| Item of Form<br>(identify)   | Answer  |  |
| 1. A,B and C   | <p>VALIC Financial Advisors, Inc. ("Firm" or "VFA"), a wholly-owned subsidiary of The Variable Annuity Life Insurance Company, an indirect wholly-owned subsidiary of AIG Life Holdings (US), Inc. ("AIGLH"), a wholly-owned subsidiary of American International Group, Inc. (AIG), is registered with the Securities and Exchange Commission ("SEC") as an investment adviser and a broker-dealer. The broker-dealer is a Financial Industry Regulatory Authority, Inc. ("FINRA") member firm. In its capacity as a broker-dealer and investment adviser, the Firm is compensated through a mixture of fixed fees, commissions, or a percentage of assets under management.</p> <p>VFA offers the following financial planning and investment advisory services to its clients:</p> <p>In conjunction with VALIC, VFA provides financial planning services structured around individually tailored computer-generated, personal financial plans. VFA may charge a maximum fee of up to \$1500.00 for these financial plans. The fee may be negotiable between the firm and client.</p> <p>The Firm provides advisory services to participants of employee sponsored retirement plans, and administers retirement plans for corporations, not-for-profit organizations and governmental agencies. VFA consults with the client to obtain detailed financial information and their pertinent data to enable the client to determine the appropriate investment guidelines, risk tolerance and other factors that will assist in ascertaining the suitability of the client's account. VFA formulates a plan based on the assets selected by the client. The client receives quarterly performance statements provided by the custodian of the account.</p> <p>VFA will charge up to 1% of each pool of contributions deposited into the account and not based on the assets of the account. The employer, not the individual participants of the plan, will be billed in arrears as assets are deposited in the account. The contract may be terminated by either party upon thirty (30) days written notice. If the client terminates the contract within five (5) days of signing the contract, the client shall be provided a full refund.</p> <p>The Firm offers the Managed Investment Program, a professional and flexible asset management program, in conjunction with FundQuest, Incorporated ("FundQuest"), a registered investment adviser and technology firm that designs, operates, and delivers investment programs. FundQuest has developed asset allocation models for individual portfolios, as well as a process for designing a portfolio of mutual funds and/or Exchange Traded Funds ("ETF's"), separate account managers, or other applicable investments consistent with these models. FundQuest screens load-waived mutual funds and "ETF's" in order to design portfolios and updates its research on a monthly basis.</p> <p>The advisory fees for this program are calculated as a percentage of assets in the account with a maximum advisory fee of 2% for mutual fund and or "ETF" accounts and 3% for accounts which include a separate account manager. These wrap fees are negotiable. The advisory fee is calculated quarterly, in arrears, based on the average daily value of the account during the quarter. The fee is debited from the account following the end of the quarter. If cash or cash equivalent funds in the account are not sufficient to pay the wrap fee or any of the other fees charged in connection with the account or transactions for the account, investments in the account may be liquidated in order to pay the outstanding fees. If the account is managed for only a portion of a quarter, the wrap fee will be prorated accordingly.</p> |  |

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

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

Applicant: VALIC Financial Advisors,  
Inc.

SEC File Number:  
801-54952

Date:  
**04/01/2009**

(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:<br><b>VALIC Financial Advisors, Inc.</b> | IRS Empl. Ident. No.:<br><b>76-0519992</b> |
|--|--|

| Item of Form<br>(identify) | Answer   |
|----------------------------|--|
| 1. A,B and C (cont'd.)     | <p>The Managed Investment Program is available in six accounts:</p> <ul style="list-style-type: none"> <li>* The <i>Managed Investor Account</i> offers a professional investment strategy designed in cooperation with FundQuest. For this account, we prepare a customized plan for a client based on their goals, time horizon, and risk tolerance, and also design a diversified portfolio of mutual funds utilizing pre-selected mutual funds. The funds are selected by FundQuest and the portfolios are rebalanced periodically. An investment adviser representative is continually available to answer any questions and to implement any changes the client wants to make based on changes in personal or financial circumstances, or the financial markets. This approach is more suitable for clients who prefer to defer fund selection to an asset management company for their portfolios.</li> <li>* The <i>Personal Managed Investor Account</i> offers an investment strategy based on asset allocation models, but allows flexibility in the selection of the mutual funds. The client and their investment adviser representative can select which funds to utilize or can transfer in other funds previously purchased by the client. The investment adviser representative will personally monitor the account and rebalance the account when appropriate, in accordance with the guidelines the client selects. In deciding what mutual funds to recommend, the investment adviser representative may consider a number of sources, including third-party research materials, corporate press releases, and prospectus information. The investment adviser representative will also take into account his or her own views and perspectives on mutual funds, as well as the client's preferences, risk tolerances, goals and, if applicable, previously purchased investments transferred to the account. This approach is more suitable for clients who prefer to have their portfolios managed personally by their investment adviser representatives.</li> <li>* The <i>Selected Manager Investor Account</i> allows the financial advisor to establish an investment advisory account which is then managed specifically for that client by an institutional-caliber investment manager. These investment managers, called separate account managers, usually manage large institutional accounts, but through this program, will manage individual client assets at significantly reduced investment minimums. A team of professional money managers provide ongoing manager oversight and rebalance as necessary. This account will allow the clients a higher level of specialization and service through ownership of individual securities. Each separate account can be managed for the individual client's needs, goals, time horizon, risk tolerance and other factors.</li> <li>* The <i>Index Plus Managed Investor Account</i> allows the financial advisor an investment advisory account that includes index mutual funds. Based on FundQuest study, index funds are substituted for actively managed funds in certain asset classes where active management tends to under perform the benchmarks. The portfolios provide investors with a combination of active and passive managed funds.</li> <li>* The <i>Integrated Managed Investor Account</i> combines the benefits and attributes of mutual funds, "ETF's" and separately managed accounts all into one single account. This account will allow the clients a higher level of specialization, diversification and tax management opportunities.</li> </ul> |

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



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

|   |                               |                            |
|---|-------------------------------|----------------------------|
| Applicant: VALIC Financial Advisors, Inc. | SEC File Number:<br>801-54952 | Date:<br><b>04/01/2009</b> |
|---|-------------------------------|----------------------------|

(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:<br><b>VALIC Financial Advisors, Inc.</b> |   | IRS Empl. Ident. No.:<br><b>76-0519992</b> |
|--|---|--|
| Item of Form<br>(identify)   | Answer  |  |
| 1. A,B and C (cont'd.)   | <p>The investment manager will also act as an overlay manager to efficiently monitor and implement custom investment solutions for each individual client based on unique requirements.</p> <p>* The <i>Retirement Income Account</i> offers a customized income-oriented investment strategy designed in cooperation with FundQuest. For this account, we prepare income and asset forecasts for a client based on their goals, life expectancy, and risk tolerance. We also design a diversified mutual fund portfolio utilizing pre-selected mutual funds. The funds are selected by FundQuest and rebalanced periodically. An investment adviser representative is continually available to answer any questions and to implement any changes the client wants to make based on changes in personal or financial circumstances, or the financial markets.</p> <p>The Firm also offers the Guided Portfolio Services Program. This service is currently only available to individuals who have retirement plan accounts with The Variable Annuity Life Insurance Company or VALIC Retirement Services Company. There are two services available.</p> <p><i>-Portfolio Advisor</i> - Portfolio advisor is a web-based program that enables an individual to obtain wealth forecasts, asset allocation models and investment advice through Ibbotson Associates, Inc., an independent financial expert.</p> <p><i>-Portfolio Manager</i> - Portfolio Manager is a program that combines the investment advice described in the Portfolio Advisor program above with ongoing automated asset management services including portfolio rebalancing, annual wealth forecasts, portfolio monitoring and special account statements. Additionally the individual may also receive personalized service from VFA investment adviser representatives in person or by telephone. In this program the individual will be granting VFA and Ibbotson discretionary investment authority over the account.</p> <p>Participants in the <i>Portfolio Advisor</i> service pay a fixed annual fee not to exceed \$99. The fee is charged to the Participant's account following enrollment, which entitles the Participant to use the service for one year.</p> <p>Participants in the <i>Portfolio Manager</i> service pay a fee based on assets under management with a maximum advisory fee of 1.25%. The fee is calculated at each calendar quarter end and is assessed within fifteen days after the end of such calendar quarter.</p> |  |
| 4. (A)5  | VFA utilizes various software packages as a method of analysis and strategy in implementing investment advice given to clients.   |  |
| 5.   | VFA normally requires associated persons to have a minimum of 1 (one) year of investment experience.  |  |
| 6.   | <p><b>Evelyn Mary Curran</b> <b>DOB 1965</b></p> <p><u>Educational Background:</u> University of Chicago, Illinois, BA 1987<br/>South Texas College of Law, JD 1993</p> <p><u>Business Background:</u> 12/2005 - Present - President &amp; CEO of VALIC Financial Advisors, Inc.<br/>01/2003 - Present - Senior Vice President; VALIC - Investments</p>   |  |

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

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

|  |                               |                     |
|--|-------------------------------|---------------------|
| Applicant: VALIC Financial Advisors, Inc.. | SEC File Number:<br>801-54952 | Date:<br>04/01/2009 |
|--|-------------------------------|---------------------|

(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:<br><b>VALIC Financial Advisors, Inc.</b> |  | IRS Empl. Ident. No.:<br><b>76-0519992</b> |
| Item of Form<br>(identify)   | Answer   |  |
| 6. (cont'd.)   | <p><u>Business Background:</u> 01/2003 - Present - President of VALIC Company I and II Funds<br/>09/2001 - 01/2003 - Vice President; VALIC - Variable Products and Funds</p> <p><b>Thomas G. Norwood</b> <b>DOB: 1948</b></p> <p><u>Educational Background:</u> University of San Francisco, BA Economics 1971</p> <p><u>Business Background:</u> 03/99 - Present - Director/CFO/Treasurer; VALIC Financial Advisors, Inc.<br/>01/01 - Present - Senior Vice President Broker/Dealer Operations; The Variable Annuity Life Insurance Company<br/>07/02 - Present - Executive Vice President American General Distributors, Inc.</p> <p><b>John Nicholas Packs</b> <b>DOB: 1955</b></p> <p><u>Educational Background:</u> Tufts University, BA Economics 1978<br/>Columbia Graduate School of Business MBA 1986</p> <p><u>Business Background:</u> 10/01 - Present - Vice President Investments &amp; Research; Sun America Management Company<br/>10/01 - Present - Sr. Investment Officer, VALIC Company I &amp; II</p> <p><b>Krien VerBerkmoes, III</b> <b>DOB: 1953</b></p> <p><u>Educational Background:</u> Michigan State University, BS 1975<br/>Keller Graduate School of Business MBA 1986</p> <p><u>Business Background:</u> 07/00 - Present - Vice President - Sales Compliance; The Variable Annuity Life Insurance Company<br/>01/01 - Present - Vice President Sales Practices; VALIC Financial Advisors, Inc.<br/>04/01 - Present - Chief Compliance Officer; American General Distributors, Inc.</p> |  |
| 7. A, B, C   | <p>VFA is registered with the SEC, FINRA and various state securities commissions as a general securities broker-dealer. In this capacity, VFA is involved in the sale of various types of securities, including, but not limited to, stocks, bonds and mutual funds. VFA, its principals and related persons of VFA spend approximately 75% of their time selling and managing the securities business and 25% of their time providing investment advice.</p>   |  |
| 8. C.  | <p>VFA, in its capacity as a broker-dealer, and registered representatives of VFA, may be compensated by fees or commissions. The principals of VFA, in their capacity as registered representatives of VFA may recommend VFA's broker-dealer services to clients who have or are utilizing VFA's advisory services. Clients are under no obligation to purchase or sell securities through VFA. However, if they choose to do so, commissions may be higher or lower than commission rates found at other broker-dalers.</p>  |  |

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

|   |                               |                     |
|---|-------------------------------|---------------------|
| Applicant: VALIC Financial Advisors, Inc. | SEC File Number:<br>801-54952 | Date:<br>04/01/2009 |
|---|-------------------------------|---------------------|

(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:<br><b>VALIC Financial Advisors, Inc.</b> |  | IRS Empl. Ident. No.:<br><b>76-0519992</b> |
|--|--|--|
| Item of Form<br>(identify)   | Answer   |  |
| 8. C (cont'd.)   | <p>Compensation for VFA investment adviser representatives connected with the Managed Investment Program and Guided Portfolio Services Program is based on fees charged for the investment advisory services. The VFA investment adviser representatives, as registered representatives of a securities broker-dealer, are authorized to offer and sell variable annuity products issued by The Variable Annuity Life Insurance Company (VALIC) and affiliated companies. The VFA registered representative is also authorized to offer and sell mutual funds, insurance products and certain general securities through VFA, a registered broker-dealer. The VFA investment adviser representative providing individuals investment advisory services is licensed as an insurance agent, registered representative of a securities broker-dealer and as an associated person of a registered investment adviser. These licenses and registration enable the VFA registered representative to offer and sell securities, including mutual funds and insurance products.</p> <p>VFA is affiliated with The Variable Annuity Life Insurance Company ("VALIC") a registered investment adviser and indirect, wholly-owned subsidiary of AIG Life Holdings (US), Inc. ("AIGLH"), a wholly-owned subsidiary of American International Group, Inc. ("AIG"). VALIC is primarily engaged in the offering and issuance of fixed and variable retirement annuity contracts and combinations thereof and is licensed to issue annuities in fifty states and the District of Columbia. American General Distributors, Inc. ("AGDI") is an indirect subsidiary of AIGLH and an affiliate of VFA. In its capacity as a registered broker-dealer, AGDI acts as principal underwriter for the offer, sales and distribution of variable annuity contracts issued by VALIC and its affiliates.</p> <p>SunAmerica Asset Management Corp. ("SAAMCo"), a registered investment adviser and an affiliate of VALIC serves as an administrator to registered investment companies advised by VALIC and serves as investment sub-adviser to certain investment company portfolios advised by VALIC. Brazos Capital Management, L.P. ("BCM"), a registered investment adviser and an affiliate of VALIC, provides certain advisory services to VALIC and serves as investment sub-adviser to certain investment company portfolios advised by VALIC. AIG Global Investment Corp. ("AIGGIC"), a registered investment adviser and an affiliate of VALIC, provides certain advisory services to VALIC and serves as investment sub-adviser to certain investment company portfolios advised by VALIC.</p> <p>VFA has retained the services of FundQuest, Incorporated ("FundQuest") in offering the VFA Managed Investment Program, a fee-based program. FundQuest is a registered investment adviser and technology firm that designs, operates and delivers investment programs that VFA utilizes to offer a fee-based program.</p> <p>VFA has retained the services of VALIC in offering a Comprehensive Financial Planning Program. VALIC Acumen is owned by VALIC and provides financial planning software that VFA utilizes to offer its financial planning program.</p> <p>VFA has retained the services of Ibbotson Associates, Inc. as an independent financial expert for the Guided Portfolio Services Program. Ibbotson is a registered investment advisor and utilizes programs and technology to provide asset management services, portfolio monitoring and investment advice.</p> |  |

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

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|--|-------------------------------|---------------------|
| Applicant: VALIC Financial Advisors, Inc.. | SEC File Number:<br>801-54952 | Date:<br>04/01/2009 |
|--|-------------------------------|---------------------|

(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:<br><b>VALIC Financial Advisors, Inc.</b> |  | IRS Empl. Ident. No.:<br><b>76-0519992</b> |
|--|--|--|
| Item of Form<br>(identify)   | Answer   |  |
| 9.   | <p>The Firm has adopted a Code of Ethics ("Code"), the full text of which is available to Clients and Prospective Clients upon request. The Firm has several goals in adopting this Code. The Firm desires to comply with all applicable laws and regulations governing its practices. Therefore, the Firm has set forth guidelines for professional standards of conduct for its associated persons, the goal of which is to protect Client interests at all times and to demonstrate its commitment to its principles of honesty, good faith, and fair dealing with Clients. All associated persons are expected to adhere strictly to these guidelines. They are also expected to follow procedures for reporting of any violations as established in the Code.</p> <p>In its capacity as a broker-dealer, VFA provides to its clients a variety of products and services for which it is compensated. To the extent that an advisory client chooses to utilize VFA's services as a broker-dealer, VFA and its associated persons may earn compensation in the form of brokerage commissions in addition to advisory fees.</p> <p>VFA associated persons may recommend to clients the purchase or sale of investment products in which it or a related entity may have some financial interest, including, but not limited to, the receipt of compensation.</p> <p>Records will be maintained of all securities bought or sold by associated persons or related entities. Such records will be available for client inspection upon request.</p> <p>To the extent permitted by applicable law and the investment objectives, policies and restrictions, if any, applicable to client accounts, VFA may recommend that an investment be made in one or several registered investment companies for which an investment advisory affiliate acts as investment adviser or sub-adviser. In certain instances, in accordance with applicable law, VFA will waive its fee with respect to the portion of client assets so invested.</p> <p>For access and advisory persons, the Written Supervisory Procedures requires prior clearance and periodic reports on all personal securities transactions, except transactions in investment company securities and/or other exempt transactions. Further, such Written Supervisory Procedures impose certain policies and procedures concerning the misuse of material, non-public information that are designed to prevent insider trading by any officer, partner, or associated person of VFA.</p> |  |
| 10.  | <p>Depending on the nature of services to be provided, VFA may require a minimum dollar value of assets as a condition of maintaining an investment advisory account. Any pre-established minimum account size may be subject to variation depending upon, among other things, the nature of the account, the client's financial requirements, economic circumstances, investment objectives and any other factors VFA may deem relevant. VFA at its sole discretion may waive the required minimum dollar assets to maintain an account.</p> <p>VFA does not require a minimum dollar value of assets as a condition for offering a financial plan.</p>   |  |

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

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|---|-------------------------------|----------------------------|
| Applicant: VALIC Financial Advisors, Inc. | SEC File Number:<br>801-54952 | Date:<br><b>04/01/2009</b> |
|---|-------------------------------|----------------------------|

(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:<br><b>VALIC Financial Advisors, Inc.</b> |   | IRS Empl. Ident. No.:<br><b>76-0519992</b> |
|--|---|--|
| Item of Form<br>(identify)   | Answer  |  |
| 11. A  | <p>Managed Investment Program accounts will be reviewed periodically by the individual responsible for the account. A more frequent review may also be instigated by a client inquiry due to policy or other changes or in the event of a change in prevailing market conditions. Clients are offered an annual investment review, including current investment recommendations.</p> <p>The Firm engages in ongoing monitoring of the program and the investment advisor representatives, a process that includes visits with the investment advisor representatives, review and approval of all program account transactions, audits of the investment advisor representatives' records, and monitoring based upon reports on accounts.</p> <p>For each calendar quarter, each Portfolio Manager Participant's investor profile information used to generate wealth forecasts and investment advice, and perform asset management is sent to him/her for review. Further, in the quarter prior to the annual update to the wealth forecast and investment advice for each Portfolio Manager participant, the Participant is contacted to determine if there are any updates to his/her investor profile information.</p>   |  |
| 11. B  | <p>Clients of the Managed Investment Program will receive quarterly performance statements from FundQuest showing positions, activities and contributions made during the quarter. Also, quarterly, brokerage statements are provided by National Financial Services LLC. For the Guided Portfolio Services Program's Portfolio Manager service, client's will receive quarterly statements showing transactions for the prior quarter, fees imposed and current asset allocation.</p> <p>VFA, when given discretion by the client, may buy or sell securities based on the client's preferences, risk tolerances, goals and, if applicable, previously purchased investments transferred to the account.</p>   |  |
| 12. A, B   | <p>In placing orders for securities transactions, it is VFA's policy to seek the best execution for client accounts. Best execution will be based on a combination of the commission rates or net price and prompt, reliable execution. When selecting a broker-dealer, VFA considers, among other things, its execution capabilities, including block positioning, financial stability, ability to maintain confidentiality, delivery capability and ability to obtain best price. VFA seeks to negotiate commission rates on brokerage transactions. Generally, negotiations take into account the difficulty involved in execution, the time taken to conclude the transaction, the extent of the broker's commitment, if any, of its own capital and amount involved in execution. VFA may compare the commission discount that an executing broker offers to the discount offered by other brokerage firms that could provide similar services. In addition, brokers may be paid an above-average commission for superior or difficult execution.</p> <p>Generally, with respect to financial planning activities, all securities transactions are effected through VFA in its capacity as a registered broker-dealer.</p> <p>VFA does not receive proxies for securities held in client accounts. It is the policy of VFA that does not vote, nor give any advice how to vote, proxies for securities held in client accounts. Proxies for securities held in client accounts will be sent to the client by the issuer's proxy mailing service.</p> |  |
| 13. A  | <p>From time to time, the Adviser may implement programs under which the Adviser's representatives may be eligible to win nominal awards for certain sales efforts such as, but not limited to, the establishment of new accounts or additional assets under management. These programs will not change the fees the client pays for advisory services or the amounts that may be invested in any products the client may purchase.</p>   |  |

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

(for sponsors of wrap fee programs)

Name of wrap fee program or programs described in attached brochure:

1. *Applicability of Schedule.* This Schedule must be completed by applicants that are compensated under a wrap fee program for sponsoring, organizing, or administering the program, or for selecting, or providing advice to clients regarding the selection of, other investment advisers in the program ("sponsors"). A wrap fee program is any program under which a specified fee or fees not based directly upon transactions in a client's account is charged for investment advisory services (which may include portfolio management or advice concerning the selection of other investment advisers) and execution of client transactions.

2. *Use of Schedule.* This Schedule sets forth the information the sponsor must include in the wrap fee brochure it is required to deliver or offer to deliver to clients and prospective clients of its wrap fee programs under Rule 204-3 under the federal Advisers Act and similar rules of jurisdictions. The wrap fee brochure prepared in response to this Schedule must be filed with the Commission and the jurisdictions as part of Form ADV by completing the identifying information on this Schedule and attaching the brochure. Brochures should be prepared separately, not on copies of this Schedule. Any wrap fee brochure filed with the Commission as part of an amendment to Form ADV shall contain in the upper right corner of the cover page the sponsors' registration number (801- ).

3. *General Contents of Brochure.* Unlike Parts I and II of this form, this Schedule is not organized in "check-the-box" format. These instructions, including the requests for information in Item 7 below, should not be repeated in the brochure. Rather, this Schedule describes minimum disclosures that must be made in the brochure to satisfy the sponsor's duty to disclose all material facts about the sponsor and its wrap fee programs. Nothing in this Schedule relieves the sponsor from any obligation under any provision of the federal Advisers Act or rules thereunder, or other federal or state law to disclose information to its advisory clients or prospective advisory clients not specifically required by this Schedule.

4. *Multiple Sponsors.* If two or more persons fall within the definition of "sponsor" in Item 1 above for a single wrap fee program, only one such sponsor need complete the Schedule. The sponsors may choose among themselves the sponsor that will complete the Schedule.

5. *Omission of Inapplicable Information.* Any information not specifically required by this Schedule that is included in the brochure should be applicable to clients and prospective clients of the sponsor's wrap fee programs. If the sponsor is required to complete this Schedule with respect to more than one wrap fee program, the sponsor may omit from the brochure furnished to clients and prospective clients of any wrap fee program or programs information required by this Schedule that is not applicable to clients or prospective clients of that wrap fee program or programs. If a sponsor of more than one wrap fee program prepares separate wrap fee brochures for clients of different programs, each brochure must be filed with the Commission and the jurisdictions attached to a separate copy of this Schedule. Each such brochure must state that the sponsor sponsors other wrap fee programs and state how brochures for those programs may be obtained.

6. *Updating.* Sponsors are required to file an amendment to the brochure promptly after any information in the brochure becomes materially inaccurate. Amendments may be made by use of a "sticker", *i.e.*, a supplement affixed to the brochure that indicates what information is being added or updated and states the new or revised information, as long as the resulting brochure is readable. Stickers should be dated and should be incorporated into the text of the brochure when the brochure itself is revised.

7. *Contents of Brochure.* Include in the brochure prepared in response to this Schedule:

(a) on the cover page, the sponsor's name, address, telephone number, and the following legend in bold type or some other prominent fashion:

This brochure provides clients with information about [name of sponsor] and the [name of program or programs] that should be considered before becoming a client of the [name of program or programs]. This information has not been approved or verified by any governmental authority.

(b) a table of contents reflecting the subject headings in the sponsor's brochure.

(c) the amount of the wrap fee charged for each program or, if fees vary according to a schedule established by the sponsor, a table setting forth the fee schedule, whether such fees are negotiable, the portion of the total fee (or the range of such amounts) paid to persons providing advice to clients regarding the purchase or sale of specific securities under the program ("portfolio managers"), and the services provided under each program (including the types of portfolio management services);

**Schedule H of  
Form ADV  
Page 2**

Applicant: VALIC Financial Advisors, Inc.

SEC File Number:  
801- 54952

Date: 04/01/2009

- (d) a statement that the program may cost the client more or less than purchasing such services separately and a statement of the factors that bear upon the relative cost of the program (*e.g.*, the cost of the services if provided separately and the trading activity in the client's account);
- (e) if applicable, a statement that the person recommending the program to the client receives compensation as a result of the client's participation in the program, that the amount of this compensation may be more than what the person would receive if the client participated in other programs of the sponsor or paid separately for investment advice, brokerage, and other services, and that the person may therefore have a financial incentive to recommend the wrap fee program over other programs or services;
- (f) a description of the nature of any fees that the client may pay in addition to the wrap fee and the circumstances under which these fees may be paid (including, if applicable, mutual fund expenses and mark-ups, mark-downs, or spreads paid to market makers from whom securities were obtained by the wrap fee broker);
- (g) how the program's portfolio managers are selected and reviewed, the basis upon which portfolio managers are recommended or chosen for particular clients, and the circumstances under which the sponsor will replace or recommend the replacement of the portfolio manager;
- (h) (1) if applicable, a statement to the effect that portfolio manager performance information is not reviewed by the sponsor or a third party and/or that performance information is not calculated on a uniform and consistent basis,  
(2) if performance information is reviewed to determine its accuracy, the name of the party who reviews the information and a brief description of the nature of the review,  
(3) a reference to any standards (*i.e.*, industry standards or standards used solely by the sponsor) under which performance information may be calculated;
- (i) a description of the information about the client that is communicated by the sponsor to the client's portfolio manager, and how often or under what circumstances the sponsor provides updated information about the client to the portfolio manager;
- (j) any restrictions on the ability of clients to contact and consult with portfolio managers;
- (k) in narrative text, the information required by Items 7 and 8 of Part II of this form and, as applicable to clients of the wrap fee program, the information required by Items 2, 5, 6, 9A and C, 10, 11, 13 and 14 of Part II;
- (l) if any practice or relationship disclosed in response to Item 7, 8, 9A, 9C and 13 of Part II presents a conflict between the interests of the sponsor and those of its clients, explain the nature of any such conflict of interest; and
- (m) if the sponsor or its divisions or employees covered under the same investment adviser registration as the sponsor act as portfolio managers for a wrap fee program described in the brochure, a brief, general description of the investments and investment strategies utilized by those portfolio managers.

**8. Organization and Cross References.** Except for the cover page requirements in Item 7(a) above, information contained in the brochure need not follow the order of the items listed in Item 7. However, the brochure should not be organized in such a manner that important information called by the form is obscured.

Set forth below the page(s) of the brochure on which the various disclosures required by Item 7 are provided.

| Page(s)           | Page(s)                 | Page(s)                    |
|-------------------|-------------------------|----------------------------|
| Item 7(a) cover   | Item 7(f) Pages 10 & 12 | Item 7(j) N/A              |
| #7(b) Page 2      | #7(g) Pages 7-8         | #7(k) Pages 7, 9, 10, & 12 |
| #7(c) Pages 10-12 | #7(h) N/A               | #7(l) Pages 13-15          |
| #7(d) Page 12     | #7(i) Pages 7-8         | #7(m) N/A                  |
| #7(e) Page 12     |                         |                            |