

GANTZERT INVESTMENT Co., LLC

Firm Brochure - Form ADV, Part 2A

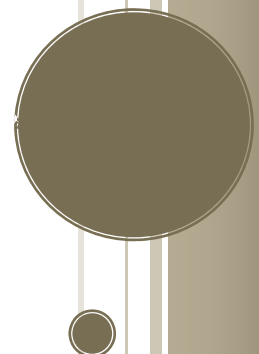
This brochure provides you with information about the qualifications and business practices of Gantzert Investment Co., LLC. If you have any questions about the contents of this brochure, please contact us at (815) 773-2312, or by email at invest@gantzertinvco.com.

The information in this brochure has not been approved or verified by the Securities and Exchange Commission (SEC) or any state securities authority. Additional information about Gantzert Investment Co., LLC is also available on the SEC's website at www.adviserinfo.sec.gov.

We are a professional money manager devoted to helping individuals achieve financial success. In our commitment to you, we will provide you with 1) an investment plan designed to help you meet your individual goals and objectives; 2) a detailed Net Worth Statement which is tracked annually; 3) a long-term asset allocation guideline that is based on your specific objectives and individual comfort level; 4) a disciplined Common Stock and Fixed Income Strategy; and 5) financial peace of mind and the potential for a greater net worth in 10 years than if you had not used our services.

1000 ESSINGTON ROAD
SUITE 143
JOLIET, ILLINOIS 60435

FEBRUARY 27, 2012



Item 2 - Material Changes

In July 2010, the Securities and Exchange Commission (SEC) published “Amendments to Form ADV”, which amends the disclosure document (Brochure) that we provide to clients. This document is prepared according to the SEC’s requirements and rules. It is designed to provide clearly written, meaningful, and current disclosure of our business practices, conflicts of interest, and background of investment adviser and advisory personnel.

The items on this page provide a summary of the specific material changes that have been made to our Brochure since it was last updated on March 25, 2011.

We made two material changes to our Brochure. We updated our assets under management from \$147.6 million to \$152.6 million under management as of February 14, 2012.

We also made a change to our Fee Schedule. This change will decrease the fee for any account with greater than \$3 million invested in individual common stocks. Our previous schedule charged 1% on the first million, .80% on the second million, and .60% on the balance. In the new schedule below, we added an additional level, which charges 1% on the first million, .80% on the second million, .60% on the third million, and .40% on the balance. For example, an account with \$5,000,000 invested in individual common stocks would pay \$4,000 less under our new schedule.

Individual Stocks		Other Assets (Bonds and Mutual Funds)	
<u>Assets Under Management</u>	<u>Fee</u>	<u>Assets Under Management</u>	<u>Fee</u>
• Up to \$1,000,000	1.00%	• Up to \$500,000	.75%
• \$1,000,001 – \$2,000,000	.80	• \$500,001 – \$1,000,000	.50
• \$2,000,001 – \$3,000,000	.60	• \$1,000,001+	.25
• \$3,000,001+	.40		

In the past we have either delivered, or offered to deliver, our Brochure to you on an annual basis. We will deliver a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business’ fiscal year (December 31st). We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

You may request a copy of our brochure, by contacting us at (815) 773-2313 or by email at invest@gantzertinvco.com.

Item 3 - Table of Contents

Item 1 - Cover Page	i
Item 2 - Material Changes	ii
Item 3 - Table of Contents	iii
Item 4 - Advisory Business	1
Background	1
Types of Services Offered	1
Tailoring Your Account to Your Objectives	2
Wrap Fee Programs	2
Assets Under Management	2
Item 5 - Fees and Compensation	2
Investment Management Service Fees	2
Advisory Service Fees	3
Small Investor Service Fees	3
Fee Administration	3
Custody Fees	3
Expense Ratios	4
Prepayment of Fees	4
Compensation on Purchase or Sale of Securities	4
Item 6 - Performance-Based Fees and Side-By-Side Management	4
Sharing of Capital Gains	4
Item 7 - Types of Clients	5
Description	5
Account Minimums	5
Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss	5
Methods of Analysis	5
Investment Strategies	5
Risk of Loss	6
Item 9 - Disciplinary Information	6
Legal and Disciplinary	6
Item 10 - Other Financial Industry Activities and Affiliations	6

Activities and Affiliations	6
Item 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....	7
Code of Ethics	7
Participation or Interest in Client Transactions	7
Personal Trading	7
Item 12 - Brokerage Practices	8
Selecting Brokerage Firms	8
Best Execution	9
Research and Other Soft Dollar Benefits.....	9
Brokerage for Client Referrals	9
Directed Brokerage.....	9
Aggregation.....	9
Item 13 - Review of Accounts.....	10
Periodic Reviews.....	10
Review Triggers	10
Reports	10
Item 14 - Client Referrals and Other Compensation	10
Item 15 - Custody	11
Statements	11
Item 16 - Investment Discretion	11
Discretionary Authority for Trading	11
Item 17 - Voting Client Securities	11
Proxy Votes	11
Item 18 - Financial Information.....	12
Financial Condition.....	12
Item 19 - Information Security.....	12
<i>Brochure Supplement (Form ADV Part 2B)</i>	<i>13</i>

Item 4 - Advisory Business

Background

Gantzert Investment Co., LLC was formed in May 1996 because of Paul Gantzert's passion for investments and his sincere devotion to helping individuals achieve financial success. Because of this, it is our desire to keep the business small enough to serve each client on a personal basis. We have a staff of three, which includes two partners, and one assistant. Paul Gantzert is Managing Partner, responsible for investments and client service. Rhonda Bowker is a Partner and Chief Compliance Officer, who serves as business manager and is responsible for managing operations.

Types of Services Offered

- 1) *Investment Management Service.* Our primary focus, which constitutes 98% of our business, is providing discretionary, investment management services to individuals. Discretionary management is where Gantzert Investment Co., LLC makes all investment decisions in your portfolio based on your written objectives. This includes security selection, asset allocation, plan implementation, and ongoing monitoring of those investments. Through client communication and our ongoing supervision of the securities in your account, you have better knowledge and control of your investments. Our reputation is based on professionalism and high standards for the services we provide you. With your help, we provide you with a detailed net worth statement of all your assets and liabilities. It is our goal to update and track your net worth annually. We assist you in understanding your needs and objectives. Once realistic expectations are developed, asset allocation guidelines are established and monitored based on your goals and comfort level. Your assets will be invested in readily marketable bonds, stocks, and mutual funds. Your assets are held by an independent custodian, so you have comfort in knowing there are controls in place to protect your assets. Your financial peace of mind is extremely important to us.
- 2) *Advisory Service.* Upon request, we will monitor the assets you have with other money managers. We begin by making sure you have a realistic plan that meets your objectives. Then, your assets are reviewed to verify they are tailored to your objectives. Your net worth is also tracked annually.
- 3) *Small Investor Service.* We offer a small investor service on a limited basis. This service is designed to provide guidance to individuals who may not meet the minimum dollar value of assets or guidelines that are established for our investment management service. We provide guidance in the form of recommendations. Individuals have full discretion in implementing our recommendations and are responsible for placing their own trades. There is no ongoing relationship or commitment on either party.

Gantzert Investment Co., LLC is strictly a fee-only investment management firm. We do not sell annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products. The Firm is not affiliated with entities that sell financial products or securities. No

commissions in any form are received and no finder's fees are accepted. Additionally, we do not provide brokerage services, accounting services, legal services, tax planning, or financial planning.

Tailoring Your Account to Your Objectives

Together we develop an investment plan that is designed to help you meet your individual goals and objectives. Once realistic expectations have been developed, your objectives are put in writing. This is incorporated in your Investment Policy Statement, and it is the cornerstone of your investment plan. We make investment decisions for your portfolio based on your Investment Policy Statement. The Investment Policy Statement details information on your net worth (including any outside investments), time frame for investments, debts, income tax bracket, planned additions and withdrawals, asset allocation guidelines, expectations, any restrictions and/or special considerations. These guidelines are reviewed periodically to assure it fits your long-term plan and is tailored to your comfort level.

Since we only take accounts where we have sole discretion, there is limited need for investment restrictions; however, all of our clients may impose reasonable restrictions on the management of their accounts. Restrictions are reviewed on a case-by-case basis. In certain situations, we may recommend holding a restricted security in a separate custody account, in which we have no discretion or investment authority.

Wrap Fee Programs

Gantzert Investment Co., LLC does not participate in any wrap fee programs. This is a program defined as any advisory program under which a specified fee or fees not based directly upon transactions in a client's account is charged for investment advisory services and the execution of client transactions.

Assets Under Management

All assets managed by Gantzert Investment Co., LLC are on a discretionary basis. As of February 14, 2012, our assets under management totaled \$152.6 million.

Item 5 - Fees and Compensation

Investment Management Service Fees

We receive compensation for discretionary investment management services based on assets under management. We charge more for managing individual stocks than we do for managing bonds and mutual funds, which is shown in the following schedule:

Fee Schedule

Individual Stocks		Other Assets (Bonds and Mutual Funds)	
<u>Assets Under Management</u>	<u>Fee</u>	<u>Assets Under Management</u>	<u>Fee</u>
• Up to \$1,000,000	1.00%	• Up to \$500,000	.75%
• \$1,000,001 – \$2,000,000	.80	• \$500,001 – \$1,000,000	.50
• \$2,000,001 – \$3,000,000	.60	• \$1,000,001+	.25
• \$3,000,001+	.40		

Our fees are not based upon capital gains or upon capital appreciation of assets, and all fees are negotiable. As your assets grow, future fees to us will also be more. This is due to the fact that the fee is based on the then current market value.

Advisory Service Fees

The fees for advisory services, where we have been asked to monitor the investments of another money manager, are negotiated on a case-by-case basis. In those instances, there is an agreement between you and your money manager to send Gantzert Investment Co., LLC a check on a monthly basis.

Small Investor Service Fees

For the small investor services we offer, fees are billed at an hourly rate of \$200/hour. There may be occasions when a flat fee or percent of assets monitored would be charged instead of an hourly rate, depending on the complexity of the services we provide. All fees are negotiable, and are billed after the work has been completed. We receive no other compensation (e.g., commissions, 12b-1 fees, soft dollars, etc.) in connection with this service.

Fee Administration

Per written direction to custodian, investment management fees are deducted directly from your account and are taken after the end of each month. Your fees are calculated based on the month-end market value of your account at an annual rate based on above fee schedule, or negotiated fee. We provide you with a Statement every month showing how your fee is calculated. The only exception to this are fees on a corporate retirement plan where the client can direct us to bill the corporation in arrears.

Custody Fees

Each client has an agreement with the custodian and is charged a custodial fee, separate from the investment management fee. The custody fee is negotiated directly between you and the custodian and is debited from your account monthly. In addition, the custodian may receive an administrative service fee from certain money market funds utilized in non-ERISA accounts for providing administrative or shareholder services. This is disclosed in the custodian's agreement.

Expense Ratios

Mutual funds generally charge a management fee for their services as investment manager. The management fee is part of the total compensation received by the fund company and is included in the expense ratio. For example, an expense ratio of 0.50 means that the mutual fund company charges 0.5% for their services. These fees are in addition to the fees paid by you to Gantzert Investment Co., LLC. Therefore, when your assets are invested in shares of mutual funds, you pay a direct management fee to us and an indirect management fee to the fund company. We do not receive any fee from the mutual fund company.

As part of our equity and fixed income investment policy, a portion of your assets are invested in no-load mutual funds. This means shares are bought or sold without a commission or sales charge. Performance figures quoted by mutual fund companies in various publications are after their fees have been deducted.

Prepayment of Fees

You do not pay any fees in advance to us. Investment management fees are calculated monthly, in arrears.

Compensation on Purchase or Sale of Securities

We do not receive any compensation for the purchase or sale of securities or any other products. Custodians may charge transaction fees associated with the buying and selling of securities for your account. These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security. For additional information, see Item 12 - *Brokerage Practices*.

Item 6 - Performance-Based Fees and Side-By-Side Management

Sharing of Capital Gains

Fees are not based on a share of the capital gains or capital appreciation of managed securities. We do not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

Item 7 - Types of Clients

Description

The large majority of our clients are individual investors. We also manage assets for trusts, pension and profit sharing plans, and government entities. We primarily serve high net worth individuals who share in our philosophy.

Account Minimums

While we have no specific account minimum, in general we want the portion of your portfolio that will be invested in equities/common stocks to be in excess of \$600,000. There is no specific minimum balance required to be maintained in your account. However, there should be a low probability that you will withdraw more than 3-4% of your earning assets in any calendar year. Adhering to this philosophy will help you maintain your purchasing power.

Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

In formulating our investment advice and managing client assets, we rely on human capital (the experience and knowledge of our partners) and a variety of sources. The main sources of information include financial newspapers and magazines, business publications, inspections of corporate activities, research materials prepared by others, corporate rating services, annual reports, prospectuses, filings with the Securities and Exchange Commission, various conferences, seminars, analyst's meetings, and company press releases.

Investment Strategies

Your portfolio is actively managed by utilizing a disciplined Common Stock Strategy and Fixed Income Strategy. Our strategy for managing common stocks includes the use of both individual issues and mutual funds in accounts where we have more than \$250,000 allocated to common stocks. To provide adequate diversification in accounts with smaller common stock positions, we generally use mutual funds only. The funds we use have their own strategies and selection criteria, which complement our strategy and provide additional diversification. We invest in individual companies based on our 3-5 year outlook. The companies we purchase are selected because we have confidence that they will build shareholder value over the long term. Our approach would be considered "fundamental analysis" and "bottoms up". The general philosophy is that if we purchase quality companies at an attractive price, and the earnings increase over time, it will eventually be recognized in the price.

We view common stocks to be very beneficial if you have a time frame of 20 years or more. We do not believe they should be used as a short-term investment. For the long-term investor, it is best to have

a common stock objective between 25% and 75% of the total portfolio. This is coordinated with your overall net worth and objectives. We believe diversification, discipline, and patience will provide you with valuable long-term benefits.

The fixed income portion consists of funds and/or individual securities. For accounts with greater than \$250,000 allocated to fixed income, we generally invest a portion in individual bonds. We consider quality, liquidity, and marketability important factors to consider when investing in bonds. The goal is to maintain a ladder of maturities, diversifying by maturity. Depending on the amount available for individual bonds, we have a portion maturing every 6-month or 1-year period extending out over the next 5-10 years. As bonds mature, this strategy allows us to buy longer term bonds, thus increasing our average yield over time. We also use fixed income funds for liquidity and to complement our strategy. There are variations, based on current market conditions. We may use more or fewer individual bonds based on supply, relative attractiveness, and relative risks.

Risk of Loss

Investing in any security should only be made after considering not only the returns, but also the risks involved. Some of those risks include interest-rate risk, market risk, inflation risk, currency risk, reinvestment risk, business risk, liquidity risk, and financial risk. These risks are considered in developing an appropriate asset allocation for your accounts, which is stated in your Investment Policy Statement.

There will be many periods when the bond and/or stock markets will provide losses (negative returns). You should only invest your money if you are able to bear any market declines. Your comfort level is extremely important to us. Our investment approach constantly keeps the risk of loss in mind.

Item 9 - Disciplinary Information

Legal and Disciplinary

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Gantzert Investment Co., LLC. The Firm and its employees have not been involved in any legal or disciplinary events related to past or present investment clients.

Item 10 - Other Financial Industry Activities and Affiliations

Activities and Affiliations

Gantzert Investment Co., LLC nor any of our employees are registered, or have an application pending to register as a securities broker-dealer, a registered representative of a broker-dealer, a

futures commission merchant, commodity pool operator, or a commodity trading advisor. We have no affiliations with any other business or entities and receive no compensation from any other entity.

Item 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Code of Ethics

The employees of Gantzert Investment Co., LLC have adopted a Code of Ethics describing our high standard of business conduct and fiduciary duty to our clients. The Code of Ethics provides provisions relating to the confidentiality of client information, a prohibition on insider trading, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. The Code is designed to ensure that the high ethical standards long maintained by Gantzert Investment Co., LLC continue to be applied. All persons at the Firm must acknowledge the terms of the Code of Ethics annually, or as amended. Clients and prospective clients, who would like to request a copy of the Firm's Code of Ethics, may contact Rhonda Bowker at (815) 773-2313 or rbowker@gantzertinvco.com.

Participation or Interest in Client Transactions

Employees of Gantzert Investment Co., LLC may also purchase or hold securities that are recommended for purchase or sale in client accounts. To avoid any conflicts of interests, our Code of Ethics is designed to assure that the personal securities transactions, activities and interests of our employees will not interfere with making decisions in the best interest of advisory clients. (See Personal Trading below.) Employees are subject to the Firm's policies and procedures which includes various reporting and disclosure requirements.

Personal Trading

Employee accounts are managed in the same manner as client accounts. Investments are based upon written investment objectives. Therefore, employee accounts may buy or sell the same security as clients. We follow the practice of aggregating or "blocking" like trades for both client and employee accounts. This is consistent with our obligation of best execution. In such circumstances, the client and employee accounts will share commission costs equally and receive securities at a total average price.

As these situations may represent a conflict of interest, the Firm has established the following restrictions in order to ensure it meets its fiduciary responsibilities:

- 1.) Employee transactions are not allowed to receive more favorable treatment than any client or in any way disadvantage a client.

- 2.) Employees may not trade their own securities ahead of client trades.
- 3.) Employees are not permitted to engage in principal transactions. A principal transaction is where an employee would buy securities for themselves from our advisory clients or sell securities they own to advisory clients.
- 4.) Employees are not permitted to engage in agency cross transactions. In an agency transaction, an adviser arranges a transaction between different advisory clients or between a brokerage customer and an advisory client.
- 5.) Employees shall not buy or sell securities for their personal portfolios where the decision is substantially derived, in whole or in part, by reason of his or her employment unless the information is also available to the investing public on reasonable inquiry. No employee of the Firm shall prefer his or her own interest to that of any client.

Rhonda Bowker, who is the Chief Compliance Officer, reviews employee trades quarterly. Paul Gantzert also reviews employee trades.

Item 12 - Brokerage Practices

Selecting Brokerage Firms

We rely on the custodian for the execution of client transactions, pursuant to our buy/sell authorization instructions. Due to the volume of trades handled by the custodian and the quality of their staff, we deem it to be the most efficient and effective way to handle client trades.

The custodian's staff has an Investment Committee that conducts background checks on the broker-dealers and associated personnel using the Financial Industry Regulatory Authority (FINRA) website. Only broker-dealers that the Investment Committee determines pass the background check are added as approved broker-dealers. Ongoing semi-annual reviews are conducted on the approved broker-dealers and associated personnel by the custodian.

The criteria the custodian uses in selecting broker-dealers are primarily based on execution capability, market intelligence provided, research and portfolio management capabilities, and overall responsiveness. Other factors include the ability to maintain custodian's anonymity during execution, minimize trade errors, and properly bill and settle trades in a timely manner. The Committee also analyzes the overall reasonableness of brokerage commissions or other transactions costs. In doing this analysis, the Committee takes into account such factors as market conditions, size and timing of orders, depth of the market, price per share, difficulty of execution, financial responsibility, and the ability and willingness of the broker-dealer to provide liquidity by committing capital.

For orders placed in which settlement occurs on a recognized book-entry settlement system such as the Depository Trust Company or the Federal Reserve Bank, the custodian does not engage in any financial statement or credit quality examination of said broker-dealers since all such trades are

done exclusively on the delivery versus payment basis. Financial criteria are not of concern where performance in settlement is assured by a recognized and independent clearing corporation. For transactions that settle in any physical format, the custodian conducts a financial statement analysis to assure the broker-dealer's financial condition is such that it presents minimal risk of settlement loss.

Best Execution

Best execution refers to using reasonable due diligence in executing orders to ensure that the prices received reflect the optimal mix of price improvement, speed, and likelihood of execution. We communicate with the custodian regularly and monitor transactions. Utilizing the custodian to execute trades results in no additional costs to you.

Research and Other Soft Dollar Benefits

We do not have any arrangement or commitment to utilize research, research-related products, and other services obtained from broker-dealers, or third parties, on a soft dollar commission basis.

Brokerage for Client Referrals

We do not have any arrangement or commitment to receive referrals from any broker-dealer in exchange for placing transactions with them.

Directed Brokerage

It is our policy and practice not to accept advisory clients' instructions for directing their brokerage transactions to a particular broker-dealer.

Aggregation

The aggregation or blocking of client transactions allows us to execute transactions in a more timely, equitable, and efficient manner and seeks to reduce overall commission charges to clients. Our policy is to aggregate client transactions where possible and when advantageous to clients. In these instances, clients participating in any aggregated transactions will receive an average share price and transaction costs will be shared equally on a pro-rata basis. Since employee accounts are handled in the same manner as client accounts, employee transactions are blocked and placed at the same time as client transactions. This prevents employees from receiving any favorable treatment or disadvantaging a client.

Item 13 - Review of Accounts

Periodic Reviews

Accounts are monitored regularly and asset allocation guidelines are reviewed monthly. A more thorough and complete review is performed at least quarterly by Paul Gantzert. More frequent reviews may occur when market conditions dictate, or when we have new information on a particular security. Each account is reviewed according to the objectives detailed in the client's Investment Policy Statement.

Review Triggers

Other conditions that may trigger a review are deposits, withdrawals, change in investment objectives, when a stock becomes a sell, reinvestment of proceeds from maturing bonds, or when a client's own situation changes. All reviews are performed by Paul Gantzert.

Reports

Below are the reports we provide you, including their description and frequency:

- Portfolio Holdings. This report includes current market value and cost of the holdings in your account. *(Quarterly)*
- Monthly Market Value History. This report is for current year only and includes the market value at the beginning and ending of the month, additions and withdrawals, and asset growth. *(Monthly)*
- Yearly Market Value History. This report is from account inception and includes the market value at the beginning and ending of each year, annual additions and withdrawals, and asset growth. *(Annually)*
- Statement of Fees. This report shows how your fees are calculated. *(Monthly)*
- Performance. This report shows the rate of return on your account for 1-year, 3-year, and 5-year periods. *(Annually)*
- Net Worth Statement. This report shows all your assets and liabilities, including those held outside your account. *(Annually)*

Item 14 - Client Referrals and Other Compensation

Gantzert Investment Co., LLC does not receive any compensation from any outside sources providing service to clients.

We have been very fortunate to receive many client referrals over the years. The referrals came from current clients, attorneys, accountants, personal friends, and other similar sources. We do not pay for, or provide any other forms of compensation for client referrals.

Additionally, we do not accept referral fees or any form of compensation from other professionals when we refer a prospect or client to another professional.

Item 15 - Custody

Statements

Gantzert Investment Co., LLC has authority to debit fees directly from client accounts. For this reason only, we are deemed to have custody of client funds. As a matter of policy and practice, we do not permit employees or the Firm to accept or maintain custody of client assets. Your securities and funds are held with a qualified custodian. You will receive account statements directly from the custodian at least quarterly. We ask that you review your statement carefully and notify us promptly if you do not receive a statement. The custodian also gives you the option to view your portfolio information online.

You will also receive a separate statement from Gantzert Investment Co., LLC every quarter detailing the holdings in your account. We recommend you compare this report with the statement provided by the custodian and notify us if you have any questions.

Item 16 - Investment Discretion

Discretionary Authority for Trading

Gantzert Investment Co., LLC receives discretionary authority from the client at the outset of the relationship. This is provided in the Investment Management Agreement. Discretionary authority means giving us the authority to determine the securities to be bought or sold, and the amount of the securities to be bought or sold without preapproval. In all cases, however, such discretion is tailored to the objectives that are defined by the Investment Policy Statement which may include limitations or restrictions.

Discretionary trading authority facilitates placing trades in your accounts on your behalf so that we may promptly implement the investment policy that you have approved in writing.

Item 17 - Voting Client Securities

Proxy Votes

Gantzert Investment Co., LLC does not vote proxies on behalf of advisory clients. You assign proxy-voting rights to the custodian in the Investment Management Agreement. A copy of the custodian's proxy voting policy is available upon request. You are welcome to contact us for general assistance regarding proxy matters. We will provide you with our views on these items on which you have specific questions.

Item 18 - Financial Information

Financial Condition

Registered investment advisers are required to provide you with certain financial information or disclosures about Gantzert Investment Co., LLC's financial condition. Gantzert Investment Co., LLC has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy proceeding. Gantzert Investment Co., LLC does not have any debt and does not plan on borrowing any money in the future.

Item 19 - Information Security

Gantzert Investment Co., LLC is committed to maintaining the confidentiality, integrity, and security of the personal information that is entrusted to us. We also maintain physical, electronic, and procedural safeguards to help protect your information.

We limit the use of the information we gather from you to the minimum regulatory requirements and what is required to service your account with the highest standards.

We require strict confidentiality in our agreements with unaffiliated third parties that require access to your personal information, which includes consultants and auditors. Federal and state securities regulators may review our Company records and your personal records as permitted by law.

Personally identifiable information about you will be maintained while you are a client, and for the required period thereafter that records are required to be maintained by Federal and state securities laws. After that time, information may be destroyed.

We will notify you in advance if our privacy policy is expected to change. We are required by law to deliver our *Privacy Notice* to you annually, in writing.

GANTZERT INVESTMENT Co., LLC

Brochure Supplement (Form ADV Part 2B)

Paul E. Gantzert

**1000 Essington Road
Joliet, Illinois 60435**

**(815) 773-2312
paul@gantzertinvco.com**

This brochure supplement provides information about Paul E. Gantzert that supplements the Gantzert Investment Co., LLC brochure. A copy of that brochure precedes this supplement. Please contact Rhonda Bowker, either by telephone (815) 773-2313 or email at rbowker@gantzertinvco.com, if the company brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Paul Gantzert is available on the SEC's website at www.advisorinfo.sec.gov.

February 27, 2012

Educational Background and Business Experience

Paul E. Gantzert was born in 1944. After serving in the U.S. Army from 1962 to 1965 and taking several college courses while in the Army, Paul attended Joliet Junior College from 1966 to 1968. He then attended University of Illinois from 1968 to 1970 and received a bachelor's degree in agriculture economics. In 1970 to 1971, Paul attended Loyola School of Law.

His investment career began in 1970 with the Pullman Group. In 1978, he was hired by First Midwest Bancorp and worked there until 1995. At First Midwest, Paul was originally hired to head up the Trust Department and later served as President and CEO of First Midwest Asset Management Company, responsible for managing over \$1 billion in assets.

Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. Paul has no events to report.

Other Business Activities

Registered investment advisers are required to disclose if supervised persons are actively engaged in any other investment-related business or occupation. Paul is not engaged in any investment-related businesses outside of Gantzert Investment Co., LLC, nor does he have any applications pending to register with a broker-dealer or other investment firm.

Additional Compensation

Paul does not receive any additional compensation from sources other than Gantzert Investment Co., LLC.

Supervision

Gantzert Investment Co., LLC is a single office firm. Paul Gantzert is the Managing Partner and Portfolio Manager. The investments Paul makes are reviewed by Chief Compliance Officer, Rhonda Bowker. We work off an approved list of stocks and mutual funds, which is developed internally and

updated periodically. We will hold certain securities received, which are not on that list. Compliance checks are completed periodically throughout the year to verify that accounts are in line with stated objectives in clients' Investment Policy Statements. Paul Gantzert's telephone number is (815) 773-2312.