

Sachem Investment Counsel LLC

FORM ADV PART 2 - FIRM BROCHURE

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This brochure provides information about the qualifications and business practices of Sachem Investment Counsel LLC. If you have any questions about the contents of this brochure, please contact us at (440) 725-2807 or ngilmore10@aol.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Sachem Investment Counsel LLC is also available on the SEC's website at www.adviserinfo.sec.gov.

Item 2: Material Changes

This Brochure dated January 10, 2014, is an initial Brochure for Sachem Investment Counsel LLC.

In the future, this Item will discuss only specific material changes that are made to the Brochure and provide clients with a summary of such changes.

Sachem Investment Counsel LLC will ensure that clients receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of Sachem Investment Counsel LLC's fiscal year. Sachem Investment Counsel LLC may further provide other ongoing disclosure information about material changes as necessary.

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Item 4: Advisory Business

Sachem Investment Counsel LLC (“Sachem Investment”) is owned by Byron Anderson and has been registered with the United States Securities and Exchange Commission (“SEC”) as an investment adviser since [].

A. Investment Management Services

Sachem Investment provides continuous investment/portfolio management services to high net worth individuals, pension and profit sharing plans and businesses on a discretionary basis.

Sachem Investment has an initial consultation with its clients to gather in-depth information. Sachem Investment asks its clients to complete an investor profile worksheet that is designed to elicit information about what matters most to the client, how the client wants to use his/her wealth, and what the client expects from Sachem Investment. Sachem Investment then uses this information to determine the appropriate investment guidelines, risk tolerance and other factors that will assist in ascertaining the suitability of the asset management account.

Sachem Investment diversifies and manages the client’s portfolio. Investments are made based upon the client’s investment objectives, risk tolerance, net worth, net income and other various suitability factors.

B. Assets Under Management

Upon registration with the SEC Sachem Investment will have assets under management having an approximate aggregate value of \$136,000,000.00 on a *discretionary* basis.

Item 5: Fees and Compensation

All fee arrangements shall be in writing and deemed to be part of the Client Agreement by and between Sachem Investment and the client.

Sachem Investment’s compensation for investment advisory services is based on the assets under management. Fees are based on the fair market value of the assets under management on the last business day of each quarterly billing period. Fees are payable at the end of each quarterly billing period. For accounts with assets under management OF up to \$2,000,000.00, Sachem Investment’s advisory fee is 1% annually. Advisory fees for clients having assets under management greater than \$2,000,000.00 are negotiable on a client-by-client basis with Sachem Investment.

All fees due to Sachem Investment for investment advisory services shall be paid directly to Sachem Investment from the client’s account which will be held by an independent custodian. The client agrees to execute an authorization letter authorizing the direct payment of fees to the Adviser by the independent custodian.

Sachem Investment’s fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients may incur certain charges

imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to Sachem Investment's fee and Sachem Investment shall not receive any portion of these commissions, fees and costs.

Item 6: Performance-Based Fees and Side-by-Side Management

Sachem Investment does not participate in Performance-Based Fees (fees based on a share of capital gains on or capital appreciation of the assets of a client) nor Side-by-Side Management.

Item 7: Types of Clients

Sachem Investment provides continuous investment/portfolio management services to high net worth individuals, pension and profit sharing plans and businesses.

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

The investment process begins with the initial consultation and the investor questionnaire that each client is asked to complete. The client's goals and objectives are balanced with suitability for investment recommendations.

Sachem Investment conducts economic analysis using public information sources, as well as prospectuses and annual reports. Sachem Investment may use fundamental and technical analysis in its research. Fundamental analysis generally involves assessing a company's or security's value based on factors such as cash flow, sales, assets, markets, management, products and services, earnings and financial structure. Technical analysis generally involves studying trends and movements in a security's price, trading volume, and other market-related factors in an attempt to discern patterns.

The client will at all times retain the right to direct Sachem Investment as to the general types of investments that are to be utilized and to establish any general investment philosophy that is to be followed with respect to the client's account(s). It is the client's responsibility to advise Sachem Investment of the client's investment objectives and any changes thereto, as well as any specific investment restrictions applicable to the client. In the event that the client deems any investment recommended or made to be inconsistent with the client's investment objectives or restrictions, it is the client's responsibility to provide prompt written notice to Sachem Investment.

There is no certainty that any investment or strategy will be profitable or successful in achieving a client's specific investment objectives or personal financial goals.

It is impossible to predict with total certainty any return with any investment over any period of time. No such implication, suggestion or guarantee regarding your ability to attain any goal simply by investing in the hypothetical amount at the hypothetical returns for the estimated time periods

contained in any plan or report is intended or implied. Any illustrations provided to the client should not be considered as a prediction of any investment result. Principal values of your investments will fluctuate and when redeemed, may be worth more or less than your original investment. Asset management, commission, transaction and other costs will also affect your overall investment results. Asset allocation does not ensure a profit or protect against losses in any market, including a declining market.

While Sachem Investment's research is thorough, clients must be prepared to bear the risk of loss. All investments in securities risk the loss of capital. In addition, Sachem Investment has identified four principal types of risk: (a) risk that the stock market declines or the price of individual securities decline while the true long term value of the company may be unchanged or possibly even higher; (b) our analysis has been faulty; (c) external events may negatively affect the value of a specific company; and (d) fraud, in which case no amount of analysis could have been sufficient.

International and emerging market investments involve greater risks than larger, more established companies. High yield bonds involve greater risks and are not appropriate for all investors. Futures/commodities and Venture Capital / Limited Partnerships also involve greater risks and are not appropriate for all investors. Investments offering the potential for higher rates of return also involve a higher degree of risk to your principal.

Securities products are not insured by the FDIC, are not deposits or other obligations of any financial institution, are not guaranteed by any financial institution, and are subject to investment risks, including possible loss of the principal invested.

Item 9: 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 Sachem Investment or the integrity of Sachem Investment's management. Sachem Investment has no information applicable to this Item. At the time of this update, neither Sachem Investment nor its IAR, Byron Anderson, are or have been subject to any disciplinary action or judgments.

Item 10: Other Financial Industry Activities and Affiliations

Sachem Investment's sole business is providing continuous investment/portfolio management services. Neither Sachem Investment, nor its IAR, Byron Anderson, have any other financial industry activities or affiliations.

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

Sachem Investment has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to confidentiality of client information, a prohibition on insider trading, a prohibition on rumor mongering, 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. All supervised persons at Sachem Investment must acknowledge the terms of the Code of Ethics annually, or as amended.

Sachem Investment anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which Sachem Investment has management authority to effect, and will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which Sachem Investment, its affiliates and/or clients, directly or indirectly have a position of interest. Sachem Investment's employees and persons associated with Sachem Investment are required to follow Sachem Investment's Code of Ethics. Subject to satisfying this policy and applicable laws, Sachem Investment's officers, directors and employees may trade for their own accounts in securities which are recommended to and/or purchased for Sachem Investment's clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of Sachem Investment will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. In addition, the Code of Ethics requires pre-clearance of many transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between Sachem Investment and its clients.

Sachem Investment's clients or prospective clients may request a copy of the firm's Code of Ethics by contacting Byron Anderson.

It is Sachem Investment's policy that the firm will not affect any principal or agency cross securities transactions for client accounts. Sachem Investment will also not cross trades between client accounts. Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. A principal transaction may also be deemed to have occurred if a security is crossed between an affiliated hedge fund and another client account. An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the advisory client and for another person on the other side of the transaction. Agency cross transactions may arise where an adviser is dually registered as a broker-dealer or has an affiliated broker-dealer.

Item 12: Brokerage Practices

Sachem Investment recommends brokers to clients based upon individual client needs. Selection of brokers is based upon past performance of a broker's recommendation and quality of service provided.

Sachem Investment has no soft dollar or research arrangements. Sachem Investment does not engage in mark ups or mark downs. Sachem Investment's goal is to obtain best execution of each client transaction.

Item 13: Review of Accounts

All client accounts are supervised continuously and are formally reviewed on a quarterly basis by Byron Anderson, Sachem Investment's president and chief compliance officer. There is no minimum number of accounts assigned to Byron Anderson for review. Byron Anderson conducts portfolio analysis of the client's accounts. The review process contains each of the following elements: (a) evaluate the strategy that has been employed; (b) monitor the portfolio; and (c) address the need to rebalance.

In addition to the formal quarterly review, account reviews may be triggered by any one or more of the following events: (a) specific client request; or (b) change in client's goals and objectives.

All clients will receive a written annual report which outlines the client's current positions, security cost basis and current market value.

Item 14: Client Referrals and Other Compensation

Sachem Investment does not offer compensation to any party for client referrals. Sachem Investment does not accept referral fees.

Item 15: Custody

Sachem Investment does not have custody of client funds or securities.

Clients should receive at least quarterly statements from the broker-dealer, bank or other qualified custodian that holds and maintains client's investment assets. Sachem Investment urges each client to carefully review such statements.

Item 16: Investment Discretion

Sachem Investment has discretionary authority for each of its client accounts.

Item 17: Voting Client Securities

As a general matter, Sachem Investment does not accept authority to and does not typically vote proxies on behalf of its advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. Sachem Investment may provide advice to clients regarding the clients' voting of proxies. Any proxy solicitations that apply to any of Client's accounts and that are received by Sachem Investment will be immediately forwarded to Client for Client's evaluation and decision. However, on a client-by-client basis Sachem Investment may, but is not required to, agree to vote proxies on behalf of an advisory client in the manner directed by the client.

Prospectuses for newly purchased investment securities recommended by Sachem Investment will be provided directly by the associated brokerage firm, custodian, or by the provider or distributor of the recommended investment security. Sachem Investment will request the timely delivery of current Prospectus to Client's address of record when new investment securities are recommended. Such delivery will normally be made by regular US mail, and Client should receive these Prospectuses on or before the settlement date for the investment security purchase transaction(s). Client agrees to notify Sachem Investment if Prospectuses for all newly purchased investment securities are not received in a timely manner.

Item 18: Financial Information

Sachem Investment is not required to disclose its financial information.

Item 19: Requirements for State-Registered Advisers

Not applicable.