

Item 1 – Cover Page

Pine Haven Investment Counsel, Inc.
P.O. Box 758, Fairhaven, Massachusetts
02719

888-396-2749

www.pinehaveninv.com

Date of Brochure: March 25th, 2011

This Brochure provides information about the qualifications and business practices of **Pine Haven Investment Counsel, Inc.** If you have any questions about the contents of this brochure, please contact us at 888-396-2749 or info@pinehaveninv.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.

Pine Haven Investment Counsel, Inc is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an adviser provide you with information about which you determine to hire or retain an adviser.

Additional information about **Pine Haven Investment Counsel, Inc** is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

On July 28, 2010, the United State Securities and Exchange Commission published “Amendments to Form ADV” which amends the disclosure document that we provide to clients as required by SEC Rules. This brochure dated March 7th, 2011 is a new document prepared according to the SEC’s new requirements and rules. As such, this document (an ADV) is materially different in structure and requires certain new information that our previous brochure did not require.

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. We will also reference the date of our last annual update of our brochure.

In the past we have offered or delivered information about our qualifications and business practices to clients on at least an annual basis. Pursuant to new SEC Rules, we will ensure that you receive a summary of any materials changes to this and subsequent brochures within 120 days of the close of our business’ fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

We will further provide you with a new brochure as necessary based on changes or new information, at any time, without charge.

Currently, our full brochure may be requested by contacting Kori Allen, Principal at 503-305-3726 or kori@pinehaveninv.com. Our brochure is also available on our web site www.pinehaveninv.com, also free of charge.

Additional information about **Pine Haven Investment Counsel, Inc.** is available via the SEC’s web site www.adviserinfo.sec.gov. The SEC’s web site also provides information about any persons affiliated with Pine Haven Investment Counsel, Inc. who are registered, or are required to be registered, as investment adviser representatives of our firm.

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Paige Johnson Roth, CFA®	IIB:1
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Item 4 – Advisory Business

General Information: Pine Haven Investment Counsel, Inc. (Pine Haven) was established in 1999 by Paige Johnson Roth, while she was living in Portland, Oregon. In 2001, Paige and the company moved to Massachusetts. Kori Allen, of Portland Oregon, joined the firm in 2009. Paige is the majority shareholder and Kori is buying into the firm over time. Further information about Kori and Paige is included in the Brochure Supplement provided at the end of this document.

Kori and Paige work with a few additional professionals. Marcia Joslyn Sill serves as a special advisor to Pine Haven and is unpaid. She has an extensive background in the financial services industry and for many years she ran her own firm. Marcia lives in Seattle, is a Chartered Financial Analyst (CFA) and provides consultation and advisory services to Pine Haven. Additionally, she manages the investments on accounts for her extended family and two charitable organizations. Other professionals that we rely on for guidance include Leonard W Johnson, CFA and David Bullock. Leonard is Paige's Father and spent over 30 years in the Investment Industry. David spent over 40 years in the business and is now retired full-time. For administrative help, we rely on the part-time assistance of Diane Chacon and Heidi Werbin.

Pine Haven provides investment supervisory services. We evaluate your individual current investment situation and future goals. Using this information, we create a plan before we invest for you as the client. Assets invested are selected based on what is in your best interest. In most cases, discretionary authority is given to us to enact the plan and select individual investments. As part of this, we continuously supervise investments in your accounts.

Pine Haven Investment Counsel stresses a long term total return approach.

We invest primarily in the stocks of large United States companies. Where appropriate, we will utilize mutual funds, exchange traded funds (ETF's), sub-advisers (other investment advisers), bonds, cash, and cash equivalents in accounts.

Assets Under Management (as of 12/31/2010):

Discretionary Assets	290 Accounts	\$ 69,007,061
Non-Discretionary Assets	15 Accounts	\$ 11,865,138
Totals	305 Accounts	\$80,872,199

Total Number of Clients (on 12/31/10) 95. Most clients have more than one account.

Item 5 – Fees and Compensation

Fees are charged based upon the following standard structure. Fees are based individual circumstances and agreed upon in the signed Investment Advisory Agreement.

Basic Fees: Fees are charged and based on a percentage of your assets. You are billed based on the account value at the end of the calendar quarter. The Fee covers the recent past quarter.

Standard Fees: The annual fee structure is:

- 1.00% for market value up to \$1,000,000
- 0.75% for market value from \$1,000,000 to \$2,000,000
- 0.50% for market value from \$2,000,000 to \$5,000,000
- negotiable over \$5,000,000.

The actual percentage charged is negotiable.

Special Fee situations are listed below:

Hourly Fees: The hourly fee rate is \$250 per hour with a minimum of \$500 and is negotiable. We provide a limited number of these services mostly for specific financial planning issues. We believe that the continuous monitoring of investments is an important part of our services.

Fixed/Flat Fees: Occasionally, individuals will negotiate a flat fee (for example, \$2,500 per quarter). The amount charged will depend on your account size and your unique situation.

Minimum Fee/Assets: The annual minimum fee is \$1,000. This corresponds to a minimum asset level of \$100,000. This is negotiable.

Withdrawal/Termination: Either you or Pine Haven may terminate the Investment Advisory Agreement any time by giving written notice to the other party. Upon termination, the fee will be prorated based upon the period of management. If terminated within 5 days of signing the contract, no fees will be charged.

Payment of Fees: Generally fees are charged directly to your account(s) but you may also elect to be billed directly. Management fees shall be prorated for each large capital contribution or withdrawal made during the quarter. Accounts initiated or terminated during a calendar quarter will be charged a prorated fee. Upon termination any earned, unpaid fees will be due and payable.

Other Fees. Pine Haven's fees do not include brokerage commissions, transaction fees, and other related costs and expenses incurred by the client. Brokers, custodians, third party investments or other third parties may charge custodial fees, deferred sales charges, management fees commissions, 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 in addition to our fee, and we do not receive any portion of these commissions, fees, and costs.

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

Pine Haven does not charge any performance-based fees (These are extra fees charged on gains of the assets under management).

Item 7 – Types of Clients

We provide portfolio management services to individuals, families, small business retirement plans, charitable institutions, foundations, and endowments.

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

Investing in securities involves risk of loss that clients should be prepared to bear.

Pine Haven Investment Counsel invests for the long term. We build portfolios for you primarily with individual stocks, mutual funds, exchange traded funds, bonds and cash. Occasionally we may purchase or advise on annuities, options or real estate partnership shares on your behalf.

We research and select our investments using financial newspapers, magazines, internet sources, company press releases, annual reports, prospectuses and other SEC filings. We also obtain research information from third parties. We analyze our investments using fundamental as well as technical methods. Our general intent is to purchase and hold investments for longer than a year, however there may be instances where selling an investment prior to this time will be in your best interest. You may use margin loans or options; however this is rare and dependent upon your circumstance.

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 Pine Haven Investment Counsel, Inc or the integrity of our management. We have no information applicable to this Item as we have not received legal nor disciplinary actions.

Item 10 – Other Financial Industry Activities and Affiliations

Pine Haven is not involved with any other business and does not sell other products or services such as insurance or mortgages. We are not involved in other Financial Industry Activities such as a running a brokerage firm or investment bank.

Kori Allen formerly worked for Coldstream, which is an investment advisor, brokerage firm and mutual fund company. As part of her separation with that company, Kori shares revenue on a subset of clients formerly affiliated with Coldstream. This agreement expires in 2013. We do not have any other material arrangements with a brokerage firm, investment bank, financial planner, investment advisor, accounting, law or other firm.

Item 11 – Code of Ethics

Personal Trading Guidelines & Controls: It is our Fiduciary duty to put the interests of you and other clients ahead of our own. We make every effort to put your interests ahead of our own.

We are prohibited from trading on any non-public information (insider trading).

We are allowed to buy, sell or trade securities or other assets for our own account(s) that may also be held in your or other client accounts. Because we believe in our investment discipline and investments, we regularly invest in the same securities in which we're investing for our clients. However, as each person's situation is unique, so are our and our family's circumstances. We may acquire, increase, decrease or dispose of portions of investments which are at the same time being acquired, held or disposed of for a client account. Client accounts are given priority over any account of ours. Our personal trades are reviewed to ensure compliance with our Code of Ethics.

Block Transactions: At times, it is useful and/or beneficial to us and our clients to combine their individual trades into one large block transaction. When this is done, each client will be treated equally and will receive an average price on the security as well as benefit from any commission discount that occurs.

Cross Transactions: At no time will Pine Haven, as a firm, take the other side of a trade for our clients. Nor will we, as a firm, cross client transactions. (A crossed trade involves having different clients take the opposite position on a trade and simply report the transaction to the necessary exchange.) All trades will be transacted on the appropriate exchange or market. Records for all transactions and aggregated orders are kept securely for regular and annual review.

Code of Ethics: As a Chartered Financial Analyst (CFA) Charterholder, Paige Johnson Roth is bound by the CFA Institute Code of Ethics. The full CFA code of Ethics can be found at www.cfainstitute.org/centre/codes/ethics/pdf/english_code.pdf. Kori Allen as a Certified Financial Planner (CFP®) is also bound by the Certified Financial Planner Board of Standards, Inc. Code of Ethics. The full CFP® Code of Ethics It can be found at <http://www.cfp.net/Downloads/2009Standards.pdf>. Pine Haven Investment Counsel is bound by both codes.

In general, principles of the codes are:

1. Integrity, honesty, candor
2. Objectivity, independence
3. Competence, knowledge
4. Fairness
5. Confidentiality, loyalty, prudence
6. Professionalism
7. Diligence
8. Suitability

This code is reviewed and discussed annually.

Fiduciary: As a registered investment adviser, Pine Haven serves as a fiduciary. We take this role seriously and recognize and appreciate that you and other clients have placed the utmost trust and confidence in us to manage and protect their investments under our care. As a fiduciary we have a fundamental obligation to act in your best interest. We make every effort to ensure there are no conflicts of interest in any dealings with you or other clients, and if there is a conflict, it will be disclosed in advance or at the moment presented, whichever is first.

You may request a copy of our Code of Ethics by contacting Kori Allen, Principal and Compliance Officer at kori@pinehaveninv.com at 888-396-2749.

Item 12 – Brokerage Practices

The Custodian and Brokers We Use. Pine Haven does not maintain custody of your assets that we manage. Although regulatory agencies may consider that we have custody of your assets if you give us authority to withdraw assets from your account on your behalf (see Item 15 – Custody, below). Your assets must be maintained in an account at a “qualified custodian,” generally a brokerage firm or bank. We recommend that our clients use Charles Schwab & Co., Inc. (Schwab), a registered broker-dealer, member SIPC, as the qualified custodian.

Independent. We are independently owned and operated and are not affiliated with Schwab. Schwab will hold your assets in a brokerage account. We (and you) can then instruct Schwab to buy and sell securities. While we recommend that you use Schwab as custodian/broker, you decide whether to do so and will open your account with Schwab by entering into an account agreement directly with them. We do not open the account for you, although we may assist you in doing so.

Even though your account is maintained at Schwab, we may use other brokers to execute trades for your account as described below (see “Your Brokerage and Custody Costs”).

How We Select Brokers/Custodians. We seek to recommend a custodian/broker who will hold your assets and execute transactions on terms that are, overall, most advantageous when compared to other available providers and their services. We consider a wide range of factors, including, among others:

- Combination of transaction execution services and asset custody services
- Capability to execute, clear, and settle trades (buy and sell securities for your account)
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- Breadth of available investment products
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices
- Reputation, financial strength, and stability
- Prior service to us and our other clients
- Availability of other products and services that benefit us, as discussed below (see “Products and Services Available to Us From Schwab”).

Your Brokerage and Custody Costs. For our clients' accounts that Schwab maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. Schwab's commission rates applicable to our client accounts are negotiated with Schwab based on the total assets we maintain at Schwab. These rates are often lower than they would be otherwise. In addition to commissions Schwab charges you a flat dollar amount as a "prime broker" or "trade away" fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your Schwab account. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we have Schwab execute most trades for your account. We have determined that having Schwab execute most trades is consistent with our duty to seek "best execution" of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see "How We Select Brokers/Custodians").

Products and Services Available to Us From Schwab. Schwab Advisor Services™ (formerly called Schwab Institutional®) is Schwab's business serving independent investment advisory firms like us. They provide us and our clients with access to its institutional brokerage—trading, custody, reporting, and related services—many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our clients' accounts, while others help us manage and grow our business. Schwab's support services generally are available on an unsolicited basis (we don't have to request them) and at no charge to us as long as our clients collectively maintain a total of at least \$10 million of their assets in accounts at Schwab. If our clients collectively have less than \$10 million in assets at Schwab, Schwab may charge us quarterly service fees. Currently, 95% of our clients' assets are custodied at Charles Schwab. Following is a more detailed description of Schwab's support services:

Services That Benefit You. Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab's services described in this paragraph generally benefit you and your account.

Services That May Not Directly Benefit You. Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or a substantial number of our clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- Provide access to client account data (such as duplicate trade confirmations and account statements)
- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- Provide pricing and other market data
- Facilitate payment of our fees from our clients' accounts
- Assist with back-office functions, recordkeeping, and client reporting.

Services That Benefit Primarily Us and Clients Indirectly. Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events
- Consulting on technology, compliance, legal, and business needs
- Publications and conferences on practice management and business succession
- Access to employee benefits providers, human capital consultants, and insurance providers.

Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. Schwab may also provide us with other benefits, such as occasional business entertainment of our personnel.

Our Interest in Schwab's Services. The availability of these services from Schwab benefits us because we do not have to produce or purchase them. We don't have to pay for Schwab's services so long as our clients collectively keep a total of at least \$10 million of their assets in accounts at Schwab. The \$10 million minimum may give us an incentive to recommend that you maintain your account with Schwab, based on our interest in receiving Schwab's services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest. We believe, however, that our selection of Schwab as custodian and broker is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Schwab's services (see "How We

Select Brokers/Custodians”) and not Schwab’s services that benefit only us. We have around \$80 Million in client assets under management, and we do not believe that recommending our clients to collectively maintain at least \$10 million of those assets at Schwab in order to avoid paying Schwab quarterly service fees presents a material conflict of interest.

Item 13 – Review of Accounts

Pine Haven reviews all accounts at least on a Quarterly basis.

We follow the positions in our client accounts on a regular basis. Therefore when there is a significant change in a security all accounts holding that security will be reviewed.

The accounts are reviewed and evaluated based on your individual circumstances.

Client accounts above the minimum fee (\$1,000) or minimum asset level (\$100,000) will be mailed a quarterly review. Clients can request the report be emailed to them. Additionally, they can request the report be sent directly to interested parties (CPA’s, children, Attorney’s). Included in the quarterly report will be asset allocation information, performance information, a portfolio appraisal, a letter, and a fee invoice. Other special reports are available upon request.

Item 14 – Client Referrals and Other Compensation

Pine Haven receives an economic benefit from Schwab in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at Schwab. We do not receive any commission or other payments from Schwab.

These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12 – Brokerage Practices). The availability to us of Schwab’s products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

We do not participate in any formal referral program with any other firm or individual and do not receive compensation or pay from any other parties for referrals.

Item 15 – Custody

You need to ensure that you receive statements from your custodian. You should receive at least quarterly statements from the broker firm, bank or other qualified custodian that holds and maintains your investment assets. Schwab provides monthly statements and other firms provide at least quarterly statements. Pine Haven urges you to carefully review such statements and compare such official custodial records to the account statements that we may provide to you. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Under government regulations, we are deemed to have custody of your assets if, for example, you authorize us to instruct Schwab (or other brokerage firm where you have your account) to deduct our advisory fees directly from your account or if you grant us authority to move your money to another person's account. Schwab or other brokerage firm maintains actual custody of your assets. You will receive account statements directly from them. . They will be sent to the email or postal mailing address you provided to them. You should carefully review those statements promptly when you receive them. We also urge you to compare your brokerage account statements to the periodic portfolio reports you will receive from us.

Item 16 – Investment Discretion

Pine Haven usually is granted discretionary authority by you and other clients. Discretionary Authority allows us buy and sell securities for your account without prior approval from you. Additionally, it allows us to select the identity and amount of securities to be bought or sold. In all cases, however, such discretion is exercised in a manner consistent with the stated investment objectives of your accounts.

Investment guidelines and restrictions must be provided to us in writing.

Item 17 – Voting *Client* Securities

Proxy Voting: Publicly Traded Corporations are required each year to have an Annual Shareholder Meeting. As part of the meeting, the corporations' send out a proxy statement to collect votes of the shareholders on key issues. Pine Haven votes these proxies on behalf of clients unless instructed not to. Most clients opt to have us vote the proxies.

You may obtain a copy of Pine Haven's complete proxy voting policies and procedures upon request. You may also obtain information from us about how we voted any particular proxy.

Item 18 – Financial Information

Registered investment advisers are required in this section to provide you with certain financial information or disclosures about our financial condition. Pine Haven 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.

Item 19 – Requirements for State-Registered Advisers

Pine Haven is Currently Registered with the SEC. Because of the new rules as a result of Dodd-Frank Financial Reform it is like we will be considered a State Registered Adviser later in 2011.

Item 1- Cover Page

Paige Johnson Roth

Pine Haven Investment Counsel, Inc

P.O. Box 758/113 Laurel Street

Fairhaven, Massachusetts 02719

888-396-2749

March 7, 2011

This Brochure Supplement provides information about Paige Johnson Roth that supplements the Pine Haven Investment Counsel, Inc brochure. You should have received a copy of that brochure. Please contact Kori Allen, Principal at 503-305-3726 or kori@pinehaveninv.com if you did not receive Pine Haven's brochure or if you have any questions about the contents of this supplement.

Additional information about Paige Johnson Roth, CFA®, Principal, is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Paige Johnson Roth, CFA®

Year of Birth: 1964

Education: Wellesley College, Wellesley, MA, BA in Psychobiology, 1986; Cornell University, Ithaca, NY, MBA, 1992.

Experience: Paige is the President of Pine Haven Investment Counsel, which she founded in 1999. Prior to this she worked as a Portfolio Manager and was a Principal for Western Pacific Investment Advisers, Inc. She worked at Western Pacific from 1993 –1999. In addition to Portfolio Management, she managed the technology, finances and portfolio administration areas for Western Pacific. She completed her CFA (Chartered Financial

Analyst) in 2003 (See note below for information on the CFA program) and is a member of the Boston Society of Financial Analysts. She lives in Fairhaven, Massachusetts with her husband and twin daughters.

Chartered Financial Analyst (CFA) Program: To achieve the CFA designation individuals must have a bachelor's degree, complete a self study program, work full time for four years and take three exams over a three year period. The CFA program focuses on portfolio management and financial analysis, and provides general knowledge of other areas of finance.

Item 3- 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. No information is applicable to this Item.

Item 4- Other Business Activities

Paige is not involved in any other business activities.

Item 5- Additional Compensation

Not applicable.

Item 6 - Supervision

Paige works extensively with Kori Allen, her partner at Pine Haven.

Information regarding all Pine Haven Investment Counsel Clients is readily accessible to both Paige and Kori. Review of trading, account opening or account activities are readily accessible to both of them and summarized & reviewed regularly. At minimum of one time per year Paige will work out of Kori's office in Portland, Oregon and Kori will work out of Paige's office in Fairhaven, Massachusetts.

Item 7- Requirements for State-Registered Advisers

Item 1- Cover Page

Kori Allen

Pine Haven Investment Counsel, Inc

P.O. Box 28270

Portland, Oregon 97228

888-396-2749

March 7, 2011

This Brochure Supplement provides information about Kori Allen and supplements the Pine Haven Investment Counsel, Inc brochure. If for some reason you have not received a copy of that brochure or have questions about this supplement please contact me. (Kori Allen, Principal at 503-305-3726 or kori@pinehaveninv.com)

Additional information about Kori Allen is available on the SEC's website at www.adviserinfo.sec.gov

Item 2- Educational Background and Business Experience

Kori Allen, CFP®
Year of Birth: 1961

Education: Willamette University 1979-1981; Portland State University, BA, Political Science & Certificate in Central European Studies, 1984; University of Portland, Executive Certificate in Financial Planning, 2006.

Experience: Kori is a Principal and portfolio manager at Pine Haven Investment Counsel and joined the firm in 2009. Prior to this she worked as a Principal at Coldstream Capital Management (2003-2009) and at Western Pacific Investment Advisers, Inc. (1997-2003). At Coldstream and Western Pacific she managed over 100 client relationships. Kori received her CFP® (Certified Financial Planner) designation in 2006 (see Note below). She got her start in the investment business working on the Pacific Coast Options Exchange and then she worked at Charles Schwab & Co., Inc. She lives in Portland, Oregon with her daughter. Kori is on the board of The Library Foundation and serves on their investment

committee. She is past President of the Portland State University Alumni Association and still serves on its investment committee.

Certified Financial Planner (CFP®): To achieve this designation, individuals must have a Bachelors' degree, have over three years of experience in the industry and pass an exam after completion of a course of study. Continuing Education is an important component of this designation. Further information can be found at www.finra.org

Item 3- 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. Kori has had no legal or disciplinary events, so there is no information applicable to this Item.

Item 4- Other Business Activities

Kori is not involved in any other business activities.

Item 5- Additional Compensation

Not applicable.

Item 6 - Supervision

Information regarding all Pine Haven Investment Counsel Clients is readily accessible to both Paige and Kori. Review of trading, account opening or account activities are readily accessible to both of them and summarized & reviewed regularly. At minimum of one time per year Paige will work out of Kori's office in Portland, Oregon and Kori will work out of Paige's office in Fairhaven, Massachusetts.

Item 7- Requirements for State-Registered Advisers