

**Schedule F of
Form ADV**

Applicant:
**Sabin Investment
Management, Inc.**

SEC File Number:

801-

Date:
7/28/2008

Continuation Sheet for Form ADV Part II

(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: Sabin Investment Management, Inc.	IRS Empl. Ident. No.:
Item of Form (identify)	Answer
Items 1D	<p><u>ADVISORY SERVICES AND FEES</u></p> <p>Sabin Investment Management, Inc. ("Adviser") is an SEC Registered Investment Adviser offering financial planning and other investment advisory services to its Clients.</p> <p><u>DESCRIPTION OF SERVICES PROVIDED</u></p> <p>Portfolio Management</p> <p>Adviser will emphasize continuous personal client contact and interaction in providing discretionary investment supervisory services. Discretion is limited purchases and sales of securities. Further, Adviser will work with its clients to identify their investment goals and objectives as well as risk tolerance in order to create an initial portfolio allocation designed to complement their clients' educational, home ownership and retirement funding goals and objectives etc. Adviser may create a portfolio, consisting of individual stocks or bonds; no-load funds and/or load-waived funds (front-end commissions will not be charged).</p> <p>Investment strategy will generally focus primarily on a long term buy and hold approach as well as short-term trading opportunities. Each portfolio will be initially designed to meet a particular investment goal, which Adviser has determined to be suitable to the client's circumstances. Once the appropriate allocation has been determined, Adviser will review the portfolio at least quarterly and if necessary, suggest to the client that rebalancing take place, based upon the client's individual needs, stated goals and objectives. However, each client will have the opportunity to place reasonable restrictions on the types of investments to be held in the portfolio. Adviser's strategy, generally, will be to seek to meet client investment objectives while providing clients with access to personal advisory services at least annually, or more often, depending upon prior agreement. Adviser may suggest that the client reallocate the portfolio as necessitated by large-scale macro- economic changes in the securities markets.</p> <p><u>FINANCIAL PLANNING SERVICES</u></p> <p>Adviser may provide a variety of financial planning services, principally advisory in nature, to individuals, families and other clients regarding the management of their financial resources, based upon an analysis of client's needs. Generally, such financial planning services will involve preparing a financial program or rendering a financial consultation for clients based on the client's financial circumstances and objectives. This information normally would cover present and anticipated assets and liabilities, including insurance, savings, investments, and anticipated retirement or other employee benefits.</p>

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

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Items 1D (continued)	<p>The program developed for or financial consultation rendered to the clients will usually include general recommendations for a course of activity or specific actions to be taken by the clients. For example, recommendations may be made that the clients obtain insurance or revise existing coverage, establish an individual retirement account, increase or decrease funds held in savings accounts or invest funds in securities. Adviser may develop tax or estate plans for its clients or refer clients to an accountant or attorney.</p> <p>Adviser may also create a cash flow analysis or work with and advise the clients as to the rearrangement of cash flow in order to fund certain long term objectives such as buying a house, planning for college, retirement, etc.</p> <p><u>FEE SCHEDULE:</u> Financial Planning Services and Asset Allocation Services. As a fixed fee, typically ranging from \$250- \$5,000, for an analysis and subsequent plan. The actual cost depends on the nature and complexity of each client's circumstances.</p> <p>On an hourly basis, for \$200 per-hour, depending on the nature and complexity of each client's circumstances. An estimate for total hours will be determined at the start of the advisory relationship. The fee shall be due upon completion of the above service.</p> <p><u>FEE SCHEDULE: PORTFOLIO MANAGEMENT</u></p> <p>The minimum annual fee for management services is \$200. Accounts will receive a 10% discount for every \$1,000,000 under management. The following is the annualized cumulative schedule of fees:</p> <p>Fixed income30% Primary objectives; Current income and price stability. Equity 1% Primary objective; Growth. Growth 2% Primary objective; More aggressive Growth.</p> <p>Clients pay a pro-rata quarterly Account Fee, in arrears, based upon the market value of the Program assets as of the last business day of the preceding calendar quarter. The fee is negotiable in certain circumstances. In computing the market value of assets, Fund shares will be calculated at their respective net asset values as of the valuation date in accordance with each Fund prospectus. Any such valuation shall not be deemed a guarantee of any kind with respect to the value of those assets. In the event that additions to, or withdrawals from, the account are made during any given quarter, the applicable Account Fee will be adjusted on a pro-rata basis, based on the market value of the assets at such time to reflect the addition or withdrawal.</p>	

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Items 1D (continued)	<p><u>ADDITIONAL INFORMATION CONCERNING FEES</u></p> <p>In certain circumstances, advisory fees and account minimums may be negotiable based upon prior relationships as well as related account holdings. The fees charged are calculated as described above and are not charged on the basis of a share of capital gains or capital appreciation of the funds or any portion of the funds of an advisory client.</p> <p>All fees paid to Adviser for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds to their shareholders. These fees and expenses are described in each fund's prospectus. Such fees will generally include a management fee, other fund expenses and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge.</p> <p>A client could invest in a mutual fund directly, without the services of Adviser. In that case, the client would not receive the services provided by Adviser which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to the client's financial condition and objectives. Accordingly, the clients should review both the fees charged by the funds and the fees charged by Adviser to fully understand the total amount of fees to be paid by the clients and to thereby evaluate the advisory services being provided.</p> <p>As stated previously, all advisory fees are charged at the end of each calendar quarter, based upon the fair market value of the assets in the portfolio as of the last business day of the prior quarter. The initial fee will be prorated for the first partial quarter, if applicable. Thereafter, the fee will be payable on the first day of each calendar quarter based on the asset value of the account as of the last business day of the prior quarter. Additional deposits to the account are subject to the same fee procedures.</p> <p>Upon client's written authorization, fees will be automatically deducted from the account. Clients will be provided with a quarterly statement reflecting deduction of the advisory fee.</p> <p>Clients can terminate, without penalty, Adviser's Agreement within five business days. Thereafter, Clients will pay, where applicable, a prorated advisory fee. Such prorated advisory fee will be based upon actual services and termination costs incurred up to and at the time of termination of Adviser's services.</p> <p>Adviser generally requires a college degree or equivalent industry experience for someone to become an investment advisory representative with the firm.</p>
Item 5	

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Item of Form (identify)	Answer
Item 6	<p><u>EDUCATIONAL AND BUSINESS BACKGROUND</u></p> <p>Larry Sabin Year of Birth: 1957</p> <p>Education: B.S. in Business Management with a concentration in Finance from Brigham Young University in 1981. Awarded Certified Financial Planner designation (currently inactive) for Financial Planning in 1988. Until 2003, held Life and Disability Insurance license with the State of Washington. Until 2003, held securities licenses as an NASD Registered Principal and Options Principal.</p> <p>Business Background for Past Five Years: April, 2007 to Present, President and Chief Compliance Officer with Sabin Investment Management, Inc., June, 2000 to April 2007, Sole Proprietor Investment Adviser conducting business as Larry D. Sabin and Company, June, 2000 to October, 2003, Registered Representative with Pacific West Securities, Inc. Registered in the securities industry since 1982.</p> <p>John Dubinsky Year of Birth: 1971</p> <p>Education: BA in Business Management and Marketing from University of Washington.</p> <p>Employment History for Past Five Years: April, 2007 to Present – Investment Adviser Representative with Sabin Investment Management, Inc., July, 2004 to July, 2008, Investment Adviser Representative with Larry D. Sabin and Company., February, 2004 to Present, President and Owner of SD Taxes Corporation, October, 1999 to March, 2006, Vice President North West Region & Licensed Customs Broker for American Shipping Co., Inc. President / Owner</p> <p>Scott Gerard Smith Year Of Birth: 1960</p> <p>Education: Bachelors in Political Science from Brigham Young University in 1988. Masters of Finance in Financial Planning from Golden Gate University in 2002. Series 7 received in 1994 Series 65 received 1994.</p> <p>Business Background for the last 5 years: VP/Financial Advisor with Key Private Bank (KeyBank N.A.), January 2006 to</p>
Item 6 (continued)	

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Item 9E	<p>July 2008. VP/Senior Account Executive with Fidelity Investments, September 1993 to December 2005.</p> <p><u>PARTICIPATION OR INTEREST IN CLIENTS TRANSACTIONS/CODE OF ETHICS</u></p> <p>Adviser and/or its representatives may buy or sell for their personal account(s) investment products identical to those recommended to clients. It is the expressed policy of Adviser that neither Adviser, nor its representatives may purchase or sell any individual stock or bond prior to a transaction(s) being implemented for an advisory account. This policy is meant to prevent Adviser and/or its representatives from benefiting as a result of transactions placed on behalf of advisory accounts.</p> <p>Adviser has established the following restrictions in order to ensure its fiduciary responsibilities to clients are met:</p> <p>1) Advisors' representatives shall not buy or sell securities for their personal portfolio(s) where their decision is substantially derived, in whole or in part, by their role as an Investment Advisory Representative of Adviser, unless the information is also available to the investing public on reasonable inquiry. In no case, shall Adviser's representatives prefer their own interest to that of their advisory clients. (1) (2)</p> <p>2) Adviser emphasizes the unrestricted right of its clients to decline to implement any advice rendered.</p> <p>3) Adviser recognizes it must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices.</p> <p>Footnotes</p> <p>(1) This investment policy has been established recognizing that some securities being considered for purchase and sale on behalf of Adviser's clients trade in sufficiently broad markets to permit transactions by clients to be completed without an appreciable impact on the markets of the securities. Under certain circumstances, exceptions may be made to the policies stated above. Records of these trades, including the reasons for the exceptions, will be maintained with Adviser's records in the manner set forth above.</p> <p>(2) Open-end mutual funds and/or the investment sub-accounts which may comprise a variable insurance product are purchased or redeemed at a fixed net asset value price per share specific to the date of purchase or redemption. As such, transactions in mutual funds and/or variable insurance products by Adviser are not likely to have an impact on the prices of the fund shares in which clients invest, and are therefore not prohibited by Adviser's Investment policies and procedures.</p> <p><u>INSIDER TRADING</u></p>	
Item 9E (continued)		

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Miscellaneous	<p>In accordance with Section 204A of the Investment Advisors Act of 1940, Adviser also maintains and enforces written policies reasonably designed to prevent the misuse of material non-public information by Adviser.</p> <p><u>PROXY VOTING</u></p> <p>Adviser does not vote proxies.</p> <p><u>CONDITIONS FOR MANAGING ACCOUNTS</u></p> <p>Adviser generally requires a \$100,000 minimum account size for managed accounts. The minimum annual fee is \$200. Fees may be reduced or waived for relatives of Larry D. Sabin or under unusual circumstances. Minimum account size may be waived for existing clients and relatives of existing clients.</p> <p><u>INVESTMENT OR BROKERAGE DISCRETION/SUGGESTION OF BROKERS</u></p> <p>Adviser participates in the institutional customer program offered by TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade Inc., member NASD/SIPC ("TD Ameritrade "), an unaffiliated SEC-registered broker-dealer and NASD member. TD Ameritrade offers to independent investment adviser's services which include custody of securities, trade execution, clearance and settlement of transactions. Adviser receives some benefits from TD Ameritrade through its participation in the program. (Please see the disclosure under Item 13.A. Below.)</p> <p>In certain cases, Adviser has obtained the written consent of clients to engage in discretionary trading of securities. Such discretion is limited to the authority to select securities to be bought or sold and/or the amount of securities to be bought or sold. Adviser does not possess the authority without the client's consent to determine the broker or dealer to be used or the commission rates paid. In any event, Adviser often suggests that clients execute trades through TD Ameritrade.</p> <p>Adviser reasonably believes that in the case of managed accounts, TD Ameritrade, Inc.'s blend of execution services, commission and transaction costs as well as professionalism allows Adviser to seek best execution and competitive prices. Additionally Adviser believes that in case of financial plan recommendations being implemented, that TD Ameritrade, Inc.'s blend of execution services, commission and transaction costs as well as professionalism allows Adviser to recommend TD Ameritrade, Inc. for the establishment of a brokerage account. At all times, financial planning clients are free to execute their plan recommendations through any broker-dealer without the assistance of Adviser or its investment advisory representatives.</p> <p>As mentioned previously, clients generally grant Adviser discretionary authority</p>	
Item 10		
Items 12A & 12B		
Items 12A & 12B (continued)		

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	<p>over the selection and amount of securities to be bought and/or sold for their account without obtaining their prior consent or approval. The trading authority will allow Adviser to take advantage of time-sensitive market conditions in securities, which are consistent with the client's prior stated investment objectives. However, Adviser's investment authority may be subject to specified investment objectives, guidelines, and/or conditions imposed by the client. For example, a client may specify that the investment in any particular stock or industry should not exceed specified percentages of the value of the portfolio and/or restrictions or prohibitions of transactions in the securities of a specific industry.</p>	
Item 13A	<p><u>ADDITIONAL COMPENSATION</u></p> <p>As disclosed under Item 12.B. above, Adviser participates in TD Ameritrade's Institutional customer program and Adviser may require clients to maintain accounts with TD Ameritrade/recommend TD Ameritrade to clients for custody and brokerage services. There is no direct link between Adviser's participation in the program and the investment advice it gives to its clients, although Adviser receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): duplicate client statements and confirmations; research related products and tools; consulting services ; access to a trading desk serving advisor participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have advisory fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain Institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to Adviser by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by Adviser's related persons and may also pay or reimburse expenses including travel, lodging, meals and entertainment expenses for Adviser's personnel to attend conferences or meetings relating to the program or to TD Ameritrade's advisor custody and brokerage services generally. Some of the products and services made available by TD Ameritrade through the program may benefit Adviser but may not benefit its client accounts. These products or services may assist Adviser in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help Adviser manage and further develop its business enterprise. The benefits received by Adviser or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. Clients should be aware, however, that the receipt of economic benefits by Adviser or its related persons in and of itself creates a potential conflict of interest and may indirectly influence Adviser's choice/recommendation of TD Ameritrade for custody and brokerage services.</p>	
Item 13A (continued)		

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Miscellaneous	<p>Adviser does not maintain custody of client assets. In all managed account cases, the custodian sends quarterly statements to Adviser's clients showing all disbursements for the custodian account including the amount of the advisory fees. Clients provide written authorization permitting Adviser to be paid directly for their accounts held by the custodian or trustee.</p> <p><u>PRIVACY STATEMENT</u></p> <p>Adviser is committed to safeguarding the confidential information of its clients and holds all personal information provided to it in the strictest confidence. These records include all personal information that Adviser collects from its clients or receives from other firms in connection with any of the financial services they provide. Adviser also requires other firms with whom they deal to restrict the use of client's information. Adviser's Privacy Policy is available upon client's engagement of the firm's services or by prior request of the clients.</p>	

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