

Item 1 – Cover Page

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This Brochure provides information about the qualifications and business practices of Minis & Co., Inc. If you have any questions about the contents of this Brochure, please contact us at (912) 629-6644 and/or marka@minisinc.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.

Minis & Co., 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 Minis & Co., Inc. also 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 15, 2011 is a new document prepared according to the SEC's new requirements and rules. As such, this Document 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 material 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 Brochure may be requested by contacting Mark I. Allen, CFA, CFP, Chief Executive Officer at (912) 629-6644 or marka@minisinc.com.

Additional information about Minis & Co., Inc. is also available via the SEC's web site www.adviserinfo.sec.gov. The SEC's web site also provides information about any persons affiliated with Minis & Co., Inc. who are registered, or are required to be registered, as investment adviser representatives of Minis & Co., Inc.

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Item 4 – Advisory Business

Minis & Co., Inc. provides investment supervisory services, which is defined as the giving of continuous advice as to the investment of funds on the basis of the individual needs of each client. All client accounts are managed on a discretionary basis. The company has been in business since 1932, and has been registered since the inception of the Advisers Act of 1940. The firm was acquired in 2007 by The Savannah Bancorp, Inc., and is a wholly owned subsidiary thereof, remaining registered as a successor company. As of December 31, 2010, Minis & Co., Inc. manages \$436 million in discretionary assets under management.

We typically meet with a prospective client several times to discuss his investment requirements. Our investment objective is consistent, long-term growth of capital with relatively low risk. This approach appeals to risk-averse investors. While we have accounts that are all equity and all fixed income, most of our accounts are balanced in that they contain cash and equivalents, fixed income securities and equities. Our investment philosophy balances the higher return potential available in stocks with the relative safety available in cash and fixed income investments. Our stock selection strategy is based upon selecting stocks with above average growth prospects selling at reasonable prices. Our fixed income strategy is based upon ensuring safety of principal while pursuing the best available yield. Portfolios are managed individually and not co-mingled. A written investment guideline is created at account inception, and periodically reviewed with the client, to ensure that Minis is managing the account within the desired allocation of the client. At that time any restrictions that the client has on potential investments is discussed. In the first year, we may meet with new clients on a quarterly basis to review the portfolio. The frequency of subsequent meetings is determined by the client.

The educational and recent business background of each employee that is a member of the firm's investment committee is as follows:

Mark Irvin Allen, CFA, CFP, born 1971
Northwestern University, BA, 1993
New York University, MBA, 1999
Minis & Co., Inc. (2001-)

Albert Felton Jenkins III, CFA, born 1967
University of Georgia, BS, 1990
Yale University, MBA, 1995
Yale University, MFSc, 1995
Minis & Co., Inc. (2002-)

Item 5 – Fees and Compensation

Fees for our investment advisory services are as follows:

ASSETS	ANNUAL RATE	QTRLY RATE
On first \$1,000,000.....	1.00%	.2500%
Next \$2,000,000.....	.75%	.1875%
Next \$2,000,000.....	.50%	.1250%
Over \$5,000,000.....	.40%	.1000%

Generally, fees are payable quarterly in advance and are negotiable. Clients may choose to have fees deducted from their accounts, or may be billed to pay them directly. The client may terminate the contract without penalty within five business days and at the end of any quarterly period. He/She may also terminate during the quarter, but does not receive a refund.

Clients may choose to place their assets at either a brokerage firm or bank trust department. Clients placing assets at a brokerage firm may pay additional fees as disclosed by the brokerage firm. Should the client direct us to use a particular broker, the commissions paid may be higher than other alternatives. Please review Item 12 of this brochure regarding our Brokerage Policies.

Clients placing assets at a bank trust department will pay additional custodial fees as defined in the bank's contract and other disclosures. As a subsidiary of The Savannah Bancorp, Inc., Minis & Co., Inc. may, from time to time, combine its fees with those of The Savannah Bank's Trust Department. The combined fee schedule for investment advice, custody and trust services is as follows:

ASSETS	ANNUAL RATE	QTRLY RATE
On first \$1,000,000.....	1.25%	.3125%
Next \$2,000,000.....	.85%	.2125%
Next \$2,000,000.....	.65%	.1625%
Over \$5,000,000.....	.50%	.1250%

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

Minis & Co., Inc. does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Item 7 – Types of Clients

Minis & Co., Inc. provides portfolio management services to individuals, high net worth individuals, trusts, corporate pension and profit-sharing plans, charitable institutions, foundations, endowments, and other U.S. institutions.

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

Investment Philosophy

Our investment philosophy balances the higher return potential available in stocks with the relative safety available in cash and fixed income investments. Our stock selection strategy is based upon selecting stocks with above average growth prospects selling at reasonable prices. Our fixed income strategy is based upon ensuring safety of principal while pursuing the best available yield. Investing in securities (both equity and fixed income) involves the risk of loss that clients should be prepared to bear.

Investment Process

In the selection of individual securities for a client's portfolio, primary emphasis is placed upon liquidity, quality and growth. We invest solely in securities traded on U.S. exchanges unless directed to do otherwise by a client.

Stocks

Stocks are selected if we believe that they have the potential for above average total return over a one to two year time horizon. Total return is comprised of capital change plus dividend income. Liquidity and quality are stressed here as well, with quality being measured by analyzing financial strength, growth and stability of profits, and management competence. Once a stock achieves its potential return, at least a portion is often sold. On the downside, rather than adding to a losing position, when investment mistakes are made the entire position is sold. The risks associated with investments in stocks include the possibility of capital loss, as well as the possibility that earnings, sales and dividends may not meet expectations. By focusing on a longer term investment horizon, we try to keep trading and transaction costs as low as possible.

Cash & Fixed Income

For cash and equivalents, we use money market funds and U.S. Treasury Bills. When investing in the fixed income market, U.S. Treasury Notes and Bonds and, if appropriate, investment-grade municipals are acquired. Additionally, we will purchase Federal Agency or high quality corporate bonds and FDIC insured Certificates of Deposit. The risks associated with investments in bonds include the possibility of capital loss, particularly prior to maturity, as well as changes in interest rates, inflation rates, credit ratings, and the shape of the yield curve adversely impacting the bonds owned in an account.

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 Minis & Co., Inc. or the integrity of Minis & Co., Inc.'s management. Minis & Co., Inc. has no information applicable to this Item.

Item 10 – Other Financial Industry Activities and Affiliations

Minis & Co., Inc. is a wholly owned subsidiary of The Savannah Bancorp, Inc., a bank holding company. It's banking subsidiaries are The Savannah Bank and Bryan Bank & Trust. The Savannah Bank's Trust Department often is hired jointly with Minis & Co., Inc. Joint contracts disclose the relationship between both entities. The board of Minis & Co., Inc. includes Wiley Ellis, the Chairman of The Savannah Bancorp, Inc. and John Helmken, the CEO of The Savannah Bancorp, Inc. Additionally, Russell Carpenter, the Chairman of Minis & Co., Inc. is a Director on the board of The Savannah Bancorp, Inc.

Item 11 – Code of Ethics

Minis & Co., Inc. has a Code of Ethics adopted pursuant to SEC Rule 204A-1. It sets the principles of Minis & Co., Inc.'s responsibilities towards its clients. It is in place to ensure that at all times the employees of Minis & Co., Inc. place the interests of clients first. It covers such topics as compliance with securities laws, insider trading, conflicts of interest, personal securities transactions, gifts, confidentiality and reporting requirements. A copy of the Code of Ethics is available to any client or prospective client upon request.

Minis & Co., Inc. does not recommend investments in securities that it, or its related persons, have a material financial interest. As a wholly-owned subsidiary of The Savannah Bancorp, Inc., the firm has a material financial interest in that company. Therefore, Minis & Co., Inc. does not offer an opinion on SAVB stock, and does not charge a fee on, nor manage, holdings in The Savannah Bancorp, Inc. within client accounts.

Transactions for clients shall have priority over transactions in securities or other investments of which a related person is the beneficial owner so that such personal transactions do not operate adversely to their clients' interests. To ensure that clients' interests are not adversely affected, Minis & Co., Inc. employees will not engage in "hot" IPO transactions, nor will employees engage in securities transactions in the 24 hours prior to pending buy or sell orders for clients in the same or related securities. Employees must disclose all transactions on a quarterly basis and all holdings on an annual basis to ensure compliance with the firm's employee investment policy. A copy of the firm's employee investment policy is available upon request.

A related person is a "beneficial owner" if he/she has:

- a: a direct or indirect pecuniary interest in the securities;
- b: the power to vote or direct the voting of the shares of the securities;
- c: the power to dispose or direct the disposition of the security or investment.

Minis & Co., Inc. does not sell securities to clients. Neither the firm, nor any related person, are general partners in a partnership that solicits client investments. The firm and its related persons are not investment advisors to investment companies.

Item 12 – Brokerage Practices

Brokers are selected to effect securities transactions, and an evaluation is made on the overall reasonableness of brokerage commissions paid, based upon (1) the ability of the broker to effect the transaction, (2) the services provided to the client such as custodian or consulting services, (3) the services provided to the applicant such as research services. The applicant may pay a broker a brokerage commission in excess of that which another broker might have charged for effecting the same transaction, in recognition of the value of (a) brokerage or (b) research services provided by the broker. Indirectly, research provided is used to service all of our accounts.

A client may direct account transactions and brokerage commissions to a particular broker / brokerage firm. It must be pointed out that when a client directs Minis & Co., Inc. to use a particular broker or dealer, the client, and not Minis & Co., Inc., is responsible for negotiating commissions, and Minis & Co., Inc. may or may not be able to obtain volume discounts or best execution for the account for each transaction. In addition, under these circumstances a disparity in commission charges may exist between the commissions charged to clients who direct us to use a particular broker or dealer and clients whose accounts are not so directed.

Due to differences in the ability of Minis & Co., Inc. to negotiate similar discounts for individuals based on differences in their relationships with particular brokerage firms (account sizes, client / broker relationships, brokerage firm discount policy, etc.), clients may receive dissimilar commission rates. This difference in commission rates may lead to some clients paying lower commissions on similar transactions or in a “block” transaction. When possible, Minis & Co., Inc. attempts to execute similar trades in “block” transactions, however, due to the wide range of different brokers used, and each brokerage firm's minimum “block” order size, this is not always possible.

While there is an inherent conflict of interest in the relationship between investment advisors, consultants and brokerage firms relating to the referral of business, Minis & Co., Inc. minimizes these conflicts whenever possible. Minis & Co., Inc. does not pay or receive a fee or commission of any kind from any broker or consultant. Additionally, we do not agree to direct any transaction to a brokerage firm for execution, nor any service to a consultant, based upon anything other than each firm's ability to service Minis & Co., Inc.'s client accounts. Minis & Co., Inc. does not differentiate between referred and non-referred clients when negotiating commissions with brokerage firms.

Item 13 – Review of Accounts

All reviews are conducted by the portfolio managers. All accounts are reviewed monthly. Certain portfolios and all new accounts are reviewed more frequently. The reviews address account distribution (cash, fixed income and equities) and structure in view of the firm's current investment strategy. A review during the month is triggered by decisions to buy or sell particular securities. Finally, all major securities holdings are monitored and reviewed on a daily basis.

All clients receive, at least quarterly, a written quarterly appraisal of their account. The appraisal presents a portfolio summary by cash and equivalents, fixed income and equities. Estimated annual income is shown. Each individual security is then listed with both original cost and current market value, and estimated annual income and current yield. At the end of their fiscal year, each client receives a statement of realized gains and losses. Statements are also available monthly by request. Periodically, clients may select to meet with their portfolio manager in lieu of a written report. When this occurs, a note is entered in the client's file.

Item 14 – Client Referrals and Other Compensation

Minis & Co., Inc. is solely compensated by the payment of client fees. As part of its incentive compensation system, The Savannah Bancorp, Inc. and its subsidiaries compensate their employees for referring clients to Minis & Co., Inc. Minis & Co., Inc. employees are compensated for referring clients to The Savannah Bank's Trust Division to serve as a custodian.

Item 15 – Custody

As Minis & Co., Inc. does not custody assets, clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. Minis & Co., Inc. urges clients 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.

Item 16 – Investment Discretion

All new clients give Minis & Co. a limited power of attorney (discretionary authority) to manage the portfolio. Clients may, either at the inception of the account or at any point thereafter, place restrictions on the securities in which we are allowed to invest. Those restrictions are made in writing either in an investment policy statement, in the investment guidelines, or in other written communication from the client.

Item 17 – Voting *Client* Securities

If requested, Minis & Co., Inc. will vote client proxies on their behalf. Clients may obtain a copy of Minis & Co., Inc.'s complete proxy voting policies and procedures upon request. Clients may also obtain information from Minis & Co., Inc. about how Minis & Co., Inc. voted any proxies on behalf of their account(s). These policies address the procedures in place to remove conflicts of interest in the process of proxy voting by Minis & Co., Inc. Minis & Co., Inc. does not vote proxies for any holding of its parent The Savannah Bancorp, Inc.

Item 18 – Financial Information

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about Minis & Co., Inc.'s financial condition. Minis & Co., Inc. 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.