

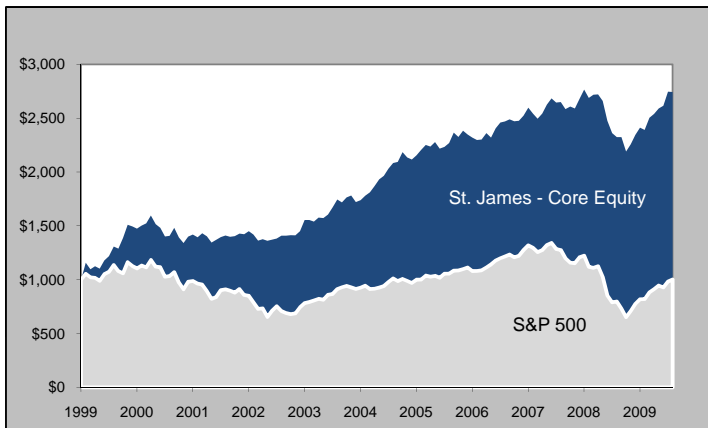
St. James Investment Company - Core Equity  
February 2010



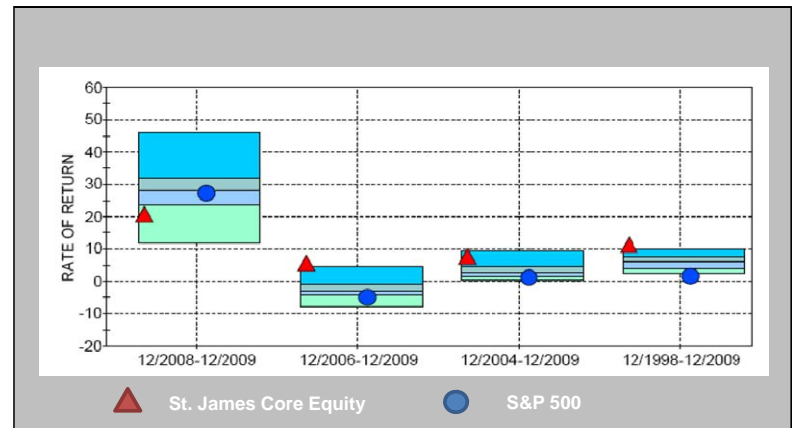
St. James is an SEC Registered Investment Adviser managing individual and institutional accounts via a strict value discipline with an objective of achieving attractive absolute returns. The portfolio managers for St. James have been employing this value philosophy of bottom-up stock selection since 1999.

	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	YTD	Cumulative Return	Compound ROR
<b>St. James Core Equity (Net)</b>	30.9%	7.6%	0.2%	(0.1%)	23.8%	19.4%	8.9%	8.8%	7.2%	(12.3%)	18.1%	0.4%	175.4%	9.9%
<b>S&amp;P 500</b>	13.7%	(9.1%)	(11.9%)	(22.1%)	28.7%	10.9%	4.3%	15.1%	4.9%	(37.4%)	25.6%	(0.7%)	(0.5%)	(0.0%)
<b>St. James Excess Return</b>	17.2%	16.7%	12.1%	22.0%	(4.9%)	8.6%	4.6%	(6.3%)	2.4%	25.1%	(7.5%)	1.1%	175.9%	9.9%

Value of \$1,000 invested in June 1999



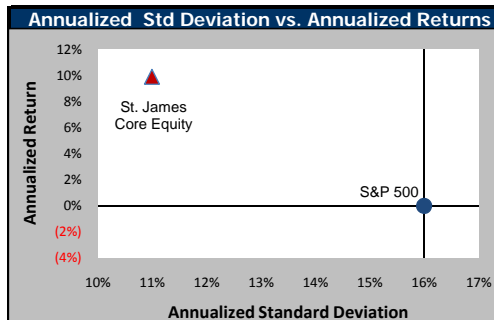
Quartile Rankings - PSN All Cap Core (through Q4 2009)



**Representative Equity Portfolio**

Berkshire Hathaway, Inc.	7.9%
Exxon Mobil	6.1%
Proctor & Gamble	5.7%
Gold Trust	4.8%
Verizon	4.8%
Johnson & Johnson	4.7%
Excelon	4.3%
Wal-Mart	4.2%
Enterprise GP Holdings	3.8%
Sysco	3.7%
Number of Positions	22
Weighted Average Market Cap (millions)	\$96,016
Median Market Cap (millions)	\$52,849

Annualized Returns	St. James	S&P 500
Last Month	1.0%	3.0%
Last Quarter	0.2%	1.2%
1-Year	25.7%	52.6%
3-Year	3.7%	(6.3%)
5-Year	4.7%	(0.2%)
7-Year	10.0%	5.6%
10-Year	7.1%	(0.6%)



Benchmark Comparison vs. S&P 500	
Annualized Alpha	9.85%
Beta	0.49
Correlation	0.72
R-Squared	0.52
Upside Capture Ratio	82.5%
Downside Capture Ratio	21.3%

Inception Date  
June 1999

Manager  
Robert Mark

Minimum Investment  
\$250,000

Investment Vehicle  
Separate Account

Redemptions  
Daily

Reporting  
Quarterly Statements

**St. James Investment Co**

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Dallas, TX 75201

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Please refer to annual disclosure page for important disclaimers and information. Returns are net of management fees. Past Performance is not a guarantee of current or future results. Capture ratios via PSN database 12/31/09.



**Core Equity Composite Disclosure Statement**

Schedule of Comparative Performance Statistics (February 26, 2010)

	Gross of Fees	Net of Fees	S&P 500	Number of Accounts in Composite	Annual Composite Dispersion	Value of Composite (millions)	% of Total Firm Assets in Composite	Total Firm Assets (millions)
1999 (June)	31.62%	30.89%	13.68%	6		\$1.9	71.43%	\$2.66
2000	8.64%	7.58%	-9.09%	9	6.17%	\$2.2	50.46%	\$4.36
2001	1.24%	0.22%	-11.88%	16	6.61%	\$4.0	62.99%	\$6.35
2002	0.88%	-0.12%	-22.11%	19	3.79%	\$7.1	20.82%	\$34.11
2003	25.07%	23.84%	28.69%	29	0.27%	\$3.4	8.24%	\$41.28
2004	20.60%	19.43%	10.87%	19	2.45%	\$5.7	12.60%	\$45.24
2005	9.99%	8.91%	4.34%	20	2.65%	\$6.7	11.09%	\$60.41
2006	9.93%	8.84%	15.14%	32	2.13%	\$12.5	13.51%	\$92.53
2007	8.32%	7.25%	4.89%	42	0.85%	\$19.3	25.30%	\$76.29
2008	-10.94%	-12.29%	-37.44%	72	3.45%	\$30.1	26.38%	\$114.10
2009	19.82%	18.05%	25.56%	271	2.66%	\$133.5	60.65%	\$220.10
YTD	0.37%	0.37%	-0.69%	283	n/a	\$154.3	64.05%	\$240.87

This summary is for information purposes only and does not constitute an offer to sell or a solicitation of an offer to buy any securities and may not be used or relied upon in connection with any offer or sale of securities. The information and statistical data contained herein have been obtained from sources that we believe to be reliable but in no way are warranted by us as to accuracy or completeness. The firm maintains a complete list and description of composites, which is available upon request. PAST PERFORMANCE IS NOT A GUARANTEE OF CURRENT OR FUTURE RESULTS.

Inquiries regarding performance or any other questions should be directed to St. James Investment Company at 214-484-7250. St. James Investment Company has prepared and presented this report in compliance with the Global Investment Performance Standards (GIPS)®. Additional information regarding policies for calculating and reporting returns is available upon request. St. James Investment Company is a Texas and New York based investment advisor registered with the Securities and Exchange Commission under the Investment Advisors Act of 1940. The firm specializes in constructing portfolios tailored to clients' preferences and constraints with a focus on achieving absolute returns. Portfolios typically include a mix of cash, fixed income and equity securities. The firm's fee schedule is normally 1.5%. Fees may be subject to negotiation where special circumstances warrant.

The Core Equity Portfolio Composite (CE) was created on January 2005 and has an inception date of June 1999. The Core Equity composite was formerly called the Equity composite. The Core Equity Portfolio composite contains accounts that were originally only part of the Capital Appreciation Composite from June 1, 1999 through December 31, 2005 that the advisor determined during October 2008 should have always been part of the Core Equity composite when it was first created on January 2005. Cash allocations are included in the historical returns. The Core Equity accounts primarily invest in US equities and has the potential to hold fixed income and expects to remain fully invested in stock market investments at all times.

The composite benchmark is the Net Total Return S&P 500 Index. The Net Total Return S&P 500 Index is an unmanaged market-capitalization weighted index measuring the performance of the 500 largest U.S. companies based on total market capitalization. New accounts that fit the composite definition are added at the first market day that the account is ready and under management. Closed account data is included in the composite as mandated by the standards in order to eliminate a survivorship bias. Portfolios in this composite may also be part of another firm composite. Our selection process may lead to investments that differ markedly from the benchmarks presented. Returns may be more volatile than, and/or may not be correlated to, these indices (for comparative purposes only).

Valuations and returns are computed and stated in U.S. dollars, and individual portfolios are revalued monthly. Portfolios also are revalued intra-month in cases where cash flows in excess of 10% of the portfolio's value occur. Pricing information is supplied by the account custodian. The firm uses the Modified Dietz formula to calculate monthly returns and links these returns geometrically to produce an accurate time-weighted rate of return. Composite returns are asset-weighted. Gross of fees returns are calculated gross of management and custodial fees and net of transaction costs. Net of fees returns are calculated net of management fees and transaction costs and gross of custodian fees. Both returns are calculated gross of all withholding taxes on foreign dividends. Accruals for fixed income and equity securities are included in calculations. The dispersion measure is the asset-weighted standard deviation of accounts in the composite for the entire year. Only portfolios represented in the composite for the entire year are included in the calculation. Net of fee returns are presented net of the maximum annual fees deducted at the end of the period. Returns in this presentation include reinvestment of all income.

St. James Investment Company has received a Firm-wide GIPS® Verification for the period 1999 through December of 2009.