

FORM ADV

UNIFORM APPLICATION FOR INVESTMENT ADVISER REGISTRATION AND REPORT BY EXEMPT REPORTING ADVISERS

Primary Business Name: **1919 INVESTMENT COUNSEL, LLC**

CRD Number: **133370**

Annual Amendment - Item 1 Identifying Information

Rev. 10/2021

WARNING: Complete this form truthfully. False statements or omissions may result in denial of your application, revocation of your registration, or criminal prosecution. You must keep this form updated by filing periodic amendments. See Form ADV General Instruction 4.

Item 1 Identifying Information

Responses to this Item tell us who you are, where you are doing business, and how we can contact you. If you are filing an *umbrella registration*, the information in Item 1 should be provided for the *filing adviser* only. General Instruction 5 provides information to assist you with filing an *umbrella registration*.

A. Your full legal name (if you are a sole proprietor, your last, first, and middle names):

1919 INVESTMENT COUNSEL, LLC

B. (1) Name under which you primarily conduct your advisory business, if different from Item 1.A.

1919 INVESTMENT COUNSEL, LLC

List on Section 1.B. of Schedule D any additional names under which you conduct your advisory business.

(2) If you are using this Form ADV to register more than one investment adviser under an *umbrella registration*, check this box

If you check this box, complete a Schedule R for each relying adviser.

C. If this filing is reporting a change in your legal name (Item 1.A.) or primary business name (Item 1.B.(1)), enter the new name and specify whether the name change is of

your legal name or your primary business name:

D. (1) If you are registered with the SEC as an investment adviser, your SEC file number: **801-63656**

(2) If you report to the SEC as an *exempt reporting adviser*, your SEC file number:

(3) If you have one or more Central Index Key numbers assigned by the SEC ("CIK Numbers"), all of your CIK numbers:

No Information Filed

E. (1) If you have a number ("CRD Number") assigned by the FINRA's CRD system or by the IARD system, your CRD number: **133370**

If your firm does not have a CRD number, skip this Item 1.E. Do not provide the CRD number of one of your officers, employees, or affiliates.

(2) If you have additional CRD Numbers, your additional CRD numbers:

No Information Filed

F. *Principal Office and Place of Business*

(1) Address (do not use a P.O. Box):

Number and Street 1:

ONE SOUTH STREET

City:

BALTIMORE

State:

Maryland

Number and Street 2:

SUITE 2500

Country:

United States

ZIP+4/Postal Code:

21202

If this address is a private residence, check this box:

List on Section 1.F. of Schedule D any office, other than your principal office and place of business, at which you conduct investment advisory business. If you are applying for registration, or are registered, with one or more state securities authorities, you must list all of your offices in the state or states to which you are applying for registration or with whom you are registered. If you are applying for SEC registration, if you are registered only with the SEC, or if you are reporting to the SEC as an exempt reporting adviser, list the largest twenty-five offices in terms of numbers of employees as of the end of your most recently completed fiscal year.

(2) Days of week that you normally conduct business at your *principal office and place of business*:

Monday - Friday Other:

Normal business hours at this location:

8:30 A.M. - 5:00 P.M.

(3) Telephone number at this location:

410-454-2171

(4) Facsimile number at this location, if any:

410-454-3154

(5) What is the total number of offices, other than your *principal office and place of business*, at which you conduct investment advisory business as of the end of your most recently completed fiscal year?

8

G. Mailing address, if different from your *principal office and place of business* address:

Number and Street 1:

Number and Street 2:

City:

State:

Country:

ZIP+4/Postal Code:

If this address is a private residence, check this box:

H. If you are a sole proprietor, state your full residence address, if different from your *principal office and place of business* address in Item 1.F.:

Number and Street 1:

Number and Street 2:

City:

State:

Country:

ZIP+4/Postal Code:

Yes No

I. Do you have one or more websites or accounts on publicly available social media platforms (including, but not limited to, Twitter, Facebook and LinkedIn)?

If "yes," list all firm website addresses and the address for each of the firm's accounts on publicly available social media platforms on Section 1.I. of Schedule D. If a website address serves as a portal through which to access other information you have published on the web, you may list the portal without listing addresses for all of the other information. You may need to list more than one portal address. Do not provide the addresses of websites or accounts on publicly available social media platforms where you do not control the content. Do not provide the individual electronic mail (e-mail) addresses of employees or the addresses of employee accounts on publicly available social media platforms.

J. Chief Compliance Officer

(1) Provide the name and contact information of your Chief Compliance Officer. If you are an *exempt reporting adviser*, you must provide the contact information for your Chief Compliance Officer, if you have one. If not, you must complete Item 1.K. below.

Name:

RESHMA BALLIE MCGOWAN

Other titles, if any:

MANAGING DIRECTOR

Telephone number:

(212) 554-7129

Facsimile number, if any:

(212) 554-7135

Number and Street 1:

787 SEVENTH AVENUE

Number and Street 2:

12TH FLOOR

City:

NEW YORK

State:

New York

Country:

United States

ZIP+4/Postal Code:

10019

Electronic mail (e-mail) address, if Chief Compliance Officer has one:

RBM@1919IC.COM

(2) If your Chief Compliance Officer is compensated or employed by any *person* other than you, a *related person* or an investment company registered under the Investment Company Act of 1940 that you advise for providing chief compliance officer services to you, provide the *person's* name and IRS Employer Identification Number (if any):

Name:

IRS Employer Identification Number:

K. Additional Regulatory Contact Person: If a person other than the Chief Compliance Officer is authorized to receive information and respond to questions about this Form ADV, you may provide that information here.

Name:

GREGORY J. KEIFER

Titles:

VICE PRESIDENT

Telephone number:

Facsimile number, if any:

(410) 454-3109

Number and Street 1:
ONE SOUTH STREET

City:
BALTIMORE

State:
Maryland

(410) 454-3154

Number and Street 2:
SUITE 2500

Country:
United States

ZIP+4/Postal Code:
21202

Electronic mail (e-mail) address, if contact person has one:
GJKEIFER@1919IC.COM

Yes No

- L. Do you maintain some or all of the books and records you are required to keep under Section 204 of the Advisers Act, or similar state law, somewhere other than your *principal office and place of business*?

If "yes," complete Section 1.L. of Schedule D.

Yes No

- M. Are you registered with a *foreign financial regulatory authority*?

Answer "no" if you are not registered with a foreign financial regulatory authority, even if you have an affiliate that is registered with a foreign financial regulatory authority. If "yes," complete Section 1.M. of Schedule D.

Yes No

- N. Are you a public reporting company under Sections 12 or 15(d) of the Securities Exchange Act of 1934?

Yes No

- O. Did you have \$1 billion or more in assets on the last day of your most recent fiscal year?

If yes, what is the approximate amount of your assets:

- \$1 billion to less than \$10 billion
 \$10 billion to less than \$50 billion
 \$50 billion or more

For purposes of Item 1.O. only, "assets" refers to your total assets, rather than the assets you manage on behalf of clients. Determine your total assets using the total assets shown on the balance sheet for your most recent fiscal year end.

- P. Provide your *Legal Entity Identifier* if you have one:

25490074P0AZ35Z01A02

A legal entity identifier is a unique number that companies use to identify each other in the financial marketplace. You may not have a legal entity identifier.

SECTION 1.B. Other Business Names

List your other business names and the jurisdictions in which you use them. You must complete a separate Schedule D Section 1.B. for each business name.

Name: ARTHUR KARAFIN INVESTMENT ADVISORS DEPARTMENT OF 1919 INVESTMENT COUNSEL, LLC

Jurisdictions

<input checked="" type="checkbox"/> AL	<input checked="" type="checkbox"/> IL	<input type="checkbox"/> NE	<input type="checkbox"/> SC
<input type="checkbox"/> AK	<input checked="" type="checkbox"/> IN	<input type="checkbox"/> NV	<input type="checkbox"/> SD
<input type="checkbox"/> AZ	<input type="checkbox"/> IA	<input checked="" type="checkbox"/> NH	<input checked="" type="checkbox"/> TN
<input type="checkbox"/> AR	<input type="checkbox"/> KS	<input checked="" type="checkbox"/> NJ	<input type="checkbox"/> TX
<input checked="" type="checkbox"/> CA	<input type="checkbox"/> KY	<input type="checkbox"/> NM	<input type="checkbox"/> UT
<input checked="" type="checkbox"/> CO	<input checked="" type="checkbox"/> LA	<input checked="" type="checkbox"/> NY	<input type="checkbox"/> VT
<input checked="" type="checkbox"/> CT	<input type="checkbox"/> ME	<input checked="" type="checkbox"/> NC	<input type="checkbox"/> VI
<input checked="" type="checkbox"/> DE	<input checked="" type="checkbox"/> MD	<input type="checkbox"/> ND	<input type="checkbox"/> VA
<input checked="" type="checkbox"/> DC	<input checked="" type="checkbox"/> MA	<input checked="" type="checkbox"/> OH	<input type="checkbox"/> WA
<input checked="" type="checkbox"/> FL	<input checked="" type="checkbox"/> MI	<input type="checkbox"/> OK	<input type="checkbox"/> WV

GA
 GU
 HI
 ID

MN
 MS
 MO
 MT

OR
 PA
 PR
 RI

WI
 WY
 Other:

SECTION 1.F. Other Offices

Complete the following information for each office, other than your *principal office and place of business*, at which you conduct investment advisory business. You must complete a separate Schedule D Section 1.F. for each location. If you are applying for SEC registration, if you are registered only with the SEC, or if you are an *exempt reporting adviser*, list only the largest twenty-five offices (in terms of numbers of employees).

Number and Street 1:
2311 HIGHLAND AVENUE SOUTH

Number and Street 2:
SUITE 190

City:
BIRMINGHAM

State:
Alabama

Country:
United States

ZIP+4/Postal Code:
35205

If this address is a private residence, check this box:

Telephone Number:
205-414-3350

Facsimile Number, if any:
205-949-3503

If this office location is also required to be registered with FINRA or a *state securities authority* as a branch office location for a broker-dealer or investment adviser on the Uniform Branch Office Registration Form (Form BR), please provide the *CRD Branch Number* here:

How many *employees* perform investment advisory functions from this office location?
9

Are other business activities conducted at this office location? (check all that apply)

- (1) Broker-dealer (registered or unregistered)
- (2) Bank (including a separately identifiable department or division of a bank)
- (3) Insurance broker or agent
- (4) Commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
- (5) Registered municipal advisor
- (6) Accountant or accounting firm
- (7) Lawyer or law firm

Describe any other *investment-related* business activities conducted from this office location:

Complete the following information for each office, other than your *principal office and place of business*, at which you conduct investment advisory business. You must complete a separate Schedule D Section 1.F. for each location. If you are applying for SEC registration, if you are registered only with the SEC, or if you are an *exempt reporting adviser*, list only the largest twenty-five offices (in terms of numbers of employees).

Number and Street 1:
49 STEVENSON STREET

Number and Street 2:
SUITE 1075

City:
SAN FRANCISCO

State:
California

Country:
United States

ZIP+4/Postal Code:
94105

If this address is a private residence, check this box:

Telephone Number:
415-500-6700

Facsimile Number, if any:
415-500-6701

If this office location is also required to be registered with FINRA or a *state securities authority* as a branch office location for a broker-dealer or investment adviser on the Uniform Branch Office Registration Form (Form BR), please provide the *CRD* Branch Number here:

How many *employees* perform investment advisory functions from this office location?

9

Are other business activities conducted at this office location? (check all that apply)

- (1) Broker-dealer (registered or unregistered)
- (2) Bank (including a separately identifiable department or division of a bank)
- (3) Insurance broker or agent
- (4) Commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
- (5) Registered municipal advisor
- (6) Accountant or accounting firm
- (7) Lawyer or law firm

Describe any other *investment-related* business activities conducted from this office location:

Complete the following information for each office, other than your *principal office and place of business*, at which you conduct investment advisory business. You must complete a separate Schedule D Section 1.F. for each location. If you are applying for SEC registration, if you are registered only with the SEC, or if you are an *exempt reporting adviser*, list only the largest twenty-five offices (in terms of numbers of *employees*).

Number and Street 1: 4445 NORTH A1A		Number and Street 2: SUITE 210	
City: VERO BEACH	State: Florida	Country: United States	ZIP+4/Postal Code: 32963

If this address is a private residence, check this box:

Telephone Number: 866-566-0425 Facsimile Number, if any:

If this office location is also required to be registered with FINRA or a *state securities authority* as a branch office location for a broker-dealer or investment adviser on the Uniform Branch Office Registration Form (Form BR), please provide the *CRD* Branch Number here:

How many *employees* perform investment advisory functions from this office location?

1

Are other business activities conducted at this office location? (check all that apply)

- (1) Broker-dealer (registered or unregistered)
- (2) Bank (including a separately identifiable department or division of a bank)
- (3) Insurance broker or agent
- (4) Commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
- (5) Registered municipal advisor
- (6) Accountant or accounting firm
- (7) Lawyer or law firm

Describe any other *investment-related* business activities conducted from this office location:

Complete the following information for each office, other than your *principal office and place of business*, at which you conduct investment advisory business. You must complete a separate Schedule D Section 1.F. for each location. If you are applying for SEC registration, if you are registered only with the SEC, or if you are an *exempt reporting adviser*, list only the largest twenty-five offices (in terms of numbers of *employees*).

Number and Street 1:
787 SEVENTH AVENUE

City:
NEW YORK

State:
New York

Number and Street 2:
12TH FLOOR

Country:
United States

ZIP+4/Postal Code:
10019

If this address is a private residence, check this box:

Telephone Number:
212-554-7100

Facsimile Number, if any:
212-554-7135

If this office location is also required to be registered with FINRA or a *state securities authority* as a branch office location for a broker-dealer or investment adviser on the Uniform Branch Office Registration Form (Form BR), please provide the *CRD* Branch Number here:

How many *employees* perform investment advisory functions from this office location?
25

Are other business activities conducted at this office location? (check all that apply)

- (1) Broker-dealer (registered or unregistered)
- (2) Bank (including a separately identifiable department or division of a bank)
- (3) Insurance broker or agent
- (4) Commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
- (5) Registered municipal advisor
- (6) Accountant or accounting firm
- (7) Lawyer or law firm

Describe any other *investment-related* business activities conducted from this office location:

Complete the following information for each office, other than your *principal office and place of business*, at which you conduct investment advisory business. You must complete a separate Schedule D Section 1.F. for each location. If you are applying for SEC registration, if you are registered only with the SEC, or if you are an *exempt reporting adviser*, list only the largest twenty-five offices (in terms of numbers of *employees*).

Number and Street 1:
600 VINE STREET

City:
CINCINNATI

State:
Ohio

Number and Street 2:
SUITE 2000

Country:
United States

ZIP+4/Postal Code:
45202-4438

If this address is a private residence, check this box:

Telephone Number:
513-621-2733

Facsimile Number, if any:
513-621-7665

If this office location is also required to be registered with FINRA or a *state securities authority* as a branch office location for a broker-dealer or investment adviser on the Uniform Branch Office Registration Form (Form BR), please provide the *CRD* Branch Number here:

How many *employees* perform investment advisory functions from this office location?
8

Are other business activities conducted at this office location? (check all that apply)

- (1) Broker-dealer (registered or unregistered)
- (2) Bank (including a separately identifiable department or division of a bank)
- (3) Insurance broker or agent
- (4) Commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
- (5) Registered municipal advisor

(6) Accountant or accounting firm

(7) Lawyer or law firm

Describe any other *investment-related* business activities conducted from this office location:

Complete the following information for each office, other than your *principal office and place of business*, at which you conduct investment advisory business. You must complete a separate Schedule D Section 1.F. for each location. If you are applying for SEC registration, if you are registered only with the SEC, or if you are an *exempt reporting adviser*, list only the largest twenty-five offices (in terms of numbers of employees).

Number and Street 1:

TWO LOGAN SQUARE,

City:

PHILADELPHIA

State:

Pennsylvania

Number and Street 2:

SUITE 1850

Country:

United States

ZIP+4/Postal Code:

19103

If this address is a private residence, check this box:

Telephone Number:

215-854-7272

Facsimile Number, if any:

215-854-3131

If this office location is also required to be registered with FINRA or a *state securities authority* as a branch office location for a broker-dealer or investment adviser on the Uniform Branch Office Registration Form (Form BR), please provide the *CRD* Branch Number here:

How many *employees* perform investment advisory functions from this office location?

8

Are other business activities conducted at this office location? (check all that apply)

(1) Broker-dealer (registered or unregistered)

(2) Bank (including a separately identifiable department or division of a bank)

(3) Insurance broker or agent

(4) Commodity pool operator or commodity trading advisor (whether registered or exempt from registration)

(5) Registered municipal advisor

(6) Accountant or accounting firm

(7) Lawyer or law firm

Describe any other *investment-related* business activities conducted from this office location:

Complete the following information for each office, other than your *principal office and place of business*, at which you conduct investment advisory business. You must complete a separate Schedule D Section 1.F. for each location. If you are applying for SEC registration, if you are registered only with the SEC, or if you are an *exempt reporting adviser*, list only the largest twenty-five offices (in terms of numbers of employees).

Number and Street 1:

1717 ARCH STREET

City:

PHILADELPHIA

State:

Pennsylvania

Number and Street 2:

SUITE 1320

Country:

United States

ZIP+4/Postal Code:

19103

If this address is a private residence, check this box:

Telephone Number:

215-981-0110

Facsimile Number, if any:

215-587-0005

If this office location is also required to be registered with FINRA or a *state securities authority* as a branch office location for a broker-dealer

or investment adviser on the Uniform Branch Office Registration Form (Form BR), please provide the *CRD* Branch Number here:

How many *employees* perform investment advisory functions from this office location?

6

Are other business activities conducted at this office location? (check all that apply)

- (1) Broker-dealer (registered or unregistered)
- (2) Bank (including a separately identifiable department or division of a bank)
- (3) Insurance broker or agent
- (4) Commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
- (5) Registered municipal advisor
- (6) Accountant or accounting firm
- (7) Lawyer or law firm

Describe any other *investment-related* business activities conducted from this office location:

Complete the following information for each office, other than your *principal office and place of business*, at which you conduct investment advisory business. You must complete a separate Schedule D Section 1.F. for each location. If you are applying for SEC registration, if you are registered only with the SEC, or if you are an *exempt reporting adviser*, list only the largest twenty-five offices (in terms of numbers of *employees*).

Number and Street 1: 2700 POST OAK BLVD	Number and Street 2: 21ST FLOOR		
City: HOUSTON	State: Texas	Country: United States	ZIP+4/Postal Code: 77056

If this address is a private residence, check this box:

Telephone Number:
800-675-0063

Facsimile Number, if any:

If this office location is also required to be registered with FINRA or a *state securities authority* as a branch office location for a broker-dealer or investment adviser on the Uniform Branch Office Registration Form (Form BR), please provide the *CRD* Branch Number here:

How many *employees* perform investment advisory functions from this office location?

1

Are other business activities conducted at this office location? (check all that apply)

- (1) Broker-dealer (registered or unregistered)
- (2) Bank (including a separately identifiable department or division of a bank)
- (3) Insurance broker or agent
- (4) Commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
- (5) Registered municipal advisor
- (6) Accountant or accounting firm
- (7) Lawyer or law firm

Describe any other *investment-related* business activities conducted from this office location:

SECTION 1.I. Website Addresses

List your website addresses, including addresses for accounts on publicly available social media platforms where you control the content (including, but not limited to, Twitter, Facebook and/or LinkedIn). You must complete a separate Schedule D Section 1.I. for each website or account on a publicly available social media platform.

Address of Website/Account on Publicly Available Social Media Platform:	HTTP://WWW.1919IC.COM
Address of Website/Account on Publicly Available Social Media Platform:	HTTP://WWW.1919STRATEGIES.COM
Address of Website/Account on Publicly Available Social Media Platform:	HTTP://WWW.LINKEDIN.COM/COMPANY/1919INVESTMENTCOUNSEL
Address of Website/Account on Publicly Available Social Media Platform:	http://www.1919funds.com
Address of Website/Account on Publicly Available Social Media Platform:	https://www.Instagram.com/1919_Investment_Counsel
Address of Website/Account on Publicly Available Social Media Platform:	https://www.facebook.com/1919investmentcounsel
Address of Website/Account on Publicly Available Social Media Platform:	https://www.youtube.com/user/LMICGlobal

SECTION 1.L. Location of Books and Records

Complete the following information for each location at which you keep your books and records, other than your *principal office and place of business*. You must complete a separate Schedule D, Section 1.L. for each location.

Name of entity where books and records are kept:
1919 INVESTMENT COUNSEL, LLC

Number and Street 1: 2311 HIGHLAND AVENUE SOUTH	Number and Street 2: SUITE 190		
City: BIRMINGHAM	State: Alabama	Country: United States	ZIP+4/Postal Code: 35205

If this address is a private residence, check this box:

Telephone Number: 205-414-3350	Facsimile number, if any: 205-949-3503
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- This is (check one):
- one of your branch offices or affiliates.
 - a third-party unaffiliated recordkeeper.
 - other.

Briefly describe the books and records kept at this location.
BIRMINGHAM OFFICE CLIENT RECORDS

Name of entity where books and records are kept:
1919 INVESTMENT COUNSEL, LLC

Number and Street 1: 49 STEVENSON STREET	Number and Street 2: SUITE 1075		
City:	State:	Country:	ZIP+4/Postal Code:

SAN FRANCISCO

California

United States

94105

If this address is a private residence, check this box:

Telephone Number:

415-500-6700

Facsimile number, if any:

415-500-6701

This is (check one):

- one of your branch offices or affiliates.
 a third-party unaffiliated recordkeeper.
 other.

Briefly describe the books and records kept at this location.

SAN FRANCISCO OFFICE BUSINESS RECORDS.

Name of entity where books and records are kept:

1919 INVESTMENT COUNSEL, LLC

Number and Street 1:

4445 NORTH A1A

Number and Street 2:

SUITE 210

City:

VERO BEACH

State:

Florida

Country:

United States

ZIP+4/Postal Code:

32963

If this address is a private residence, check this box:

Telephone Number:

866-566-0425

Facsimile number, if any:

This is (check one):

- one of your branch offices or affiliates.
 a third-party unaffiliated recordkeeper.
 other.

Briefly describe the books and records kept at this location.

VERO BEACH OFFICE CLIENT RECORDS

Name of entity where books and records are kept:

IRON MOUNTAIN

Number and Street 1:

7605 DORSEY RUN ROAD

Number and Street 2:

City:

JESSUP

State:

Maryland

Country:

United States

ZIP+4/Postal Code:

20794-9378

If this address is a private residence, check this box:

Telephone Number:

(443) 755-0670

Facsimile number, if any:

This is (check one):

- one of your branch offices or affiliates.

- a third-party unaffiliated recordkeeper.
- other.

Briefly describe the books and records kept at this location.
GENERAL BUSINESS AND ADVISORY RECORDS

Name of entity where books and records are kept:
INSTITUTIONAL SHAREHOLDER SERVICES

Number and Street 1:
702 KING FARM BLVD

Number and Street 2:
SUITE 400

City:
ROCKVILLE

State:
Maryland

Country:
United States

ZIP+4/Postal Code:
20850

If this address is a private residence, check this box:

Telephone Number:
301-556-0500

Facsimile number, if any:
301-556-0491

This is (check one):

- one of your branch offices or affiliates.
- a third-party unaffiliated recordkeeper.
- other.

Briefly describe the books and records kept at this location.
PROXY VOTING - RELATED RECORDS

Name of entity where books and records are kept:
STIFEL FINANCIAL CORP

Number and Street 1:
501 NORTH BROADWAY

Number and Street 2:

City:
ST. LOUIS

State:
Missouri

Country:
United States

ZIP+4/Postal Code:
63102

If this address is a private residence, check this box:

Telephone Number:
314-342-2000

Facsimile number, if any:

This is (check one):

- one of your branch offices or affiliates.
- a third-party unaffiliated recordkeeper.
- other.

Briefly describe the books and records kept at this location.
FINANCIAL RECORDS.

Name of entity where books and records are kept:
1919 INVESTMENT COUNSEL, LLC

Number and Street 1:
787 SEVENTH AVENUE

City:
NEW YORK

State:
New York

Number and Street 2:
12TH FLOOR

Country:
United States

ZIP+4/Postal Code:
10019

If this address is a private residence, check this box:

Telephone Number:
212-554-7100

Facsimile number, if any:
212-554-7135

This is (check one):

- one of your branch offices or affiliates.
 a third-party unaffiliated recordkeeper.
 other.

Briefly describe the books and records kept at this location.
NEW YORK OFFICE CLIENT RECORDS.

Name of entity where books and records are kept:
1919 INVESTMENT COUNSEL, LLC

Number and Street 1:
600 VINE STREET

City:
CINCINNATI

State:
Ohio

Number and Street 2:
SUITE 2000

Country:
United States

ZIP+4/Postal Code:
45202-4438

If this address is a private residence, check this box:

Telephone Number:
513-621-2733

Facsimile number, if any:
513-621-7665

This is (check one):

- one of your branch offices or affiliates.
 a third-party unaffiliated recordkeeper.
 other.

Briefly describe the books and records kept at this location.
CINCINNATI OFFICE CLIENT RECORDS.

Name of entity where books and records are kept:
ARTHUR KARAFIN INVESTMENT ADVISORS

Number and Street 1:
1717 ARCH STREET

City:
PHILADELPHIA

State:
Pennsylvania

Number and Street 2:
SUITE 1320

Country:
United States

ZIP+4/Postal Code:
19103

If this address is a private residence, check this box:

Telephone Number:
215-981-0110

Facsimile number, if any:
215-587-0005

This is (check one):

- one of your branch offices or affiliates.
- a third-party unaffiliated recordkeeper.
- other.

Briefly describe the books and records kept at this location.
ARTHUR KARAFIN INVESTMENT ADVISORS CLIENT RECORDS.

Name of entity where books and records are kept:
1919 INVESTMENT COUNSEL, LLC

Number and Street 1:
TWO LOGAN SQUARE

City:
PHILADELPHIA

State:
Pennsylvania

Number and Street 2:
SUITE 1850

Country:
United States

ZIP+4/Postal Code:
19103

If this address is a private residence, check this box:

Telephone Number:
215-854-7272

Facsimile number, if any:
215-854-3131

This is (check one):

- one of your branch offices or affiliates.
- a third-party unaffiliated recordkeeper.
- other.

Briefly describe the books and records kept at this location.
PHILADELPHIA OFFICE CLIENT RECORDS.

SECTION 1.M. Registration with Foreign Financial Regulatory Authorities

No Information Filed