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registered investment advisers

January 2011

Re: Proxy Voting by Investment Advisers SEC Rule 206(4)-6

Dear Client:

Strategic Capital Advisers, Inc. (SCA) is required by the Securities and Exchange Commission (SEC) to disclose to its clients information about SCA's proxy voting policies and procedures. This information only applies to clients where SCA exercises voting authority over client proxies. It is SCA's practice to deal with proxy voting using the following guidelines:

SCA's goal is to vote in a manner that is in the best interest of the client. If a material conflict in voting arises, SCA will vote in the best interest of the client. SCA may contact the client if a material conflict arises. All proxies will be voted on in a timely manner upon receipt of the proxy materials. All materials pertaining to proxy voting will be preserved at SCA's office.

At your written request, you may receive a copy of SCA's formal Policy and Procedures regarding proxy voting. In addition, you may receive a report of how your proxies were voted. Requests must be mailed, as SCA is required to maintain a record of all client requests.

Please contact our office if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "John Hancock", written in a cursive style.

John H. Hancock