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Name of Investment Adviser: Jensen Investment Management, Inc.				
Address: (Number and Street)	(City)	(State)	(Zip Code)	Area Code Telephone Number
5300 Meadows Road, Suite 250	Lake Oswego	OR	97035-8234	503 726-4384

This part of Form ADV gives information about the investment adviser and its business for the use of clients. The information has not been approved or verified by any governmental authority.

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(Schedules A, B, C, D, and E are included with Part I of this Form, for the use of regulatory bodies, and are not distributed to clients.)
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Potential Persons who are not to respond to the collection of information contained in this form are not required to respond unless the form displays a currently valid OMB control number.

1. A. Advisory Services and Fees. (check the applicable boxes) For each type of service provided, state the approximate % of total advisory billings from that service. (See instruction below.)

Applicant:

<input checked="" type="checkbox"/> (1) Provides investment supervisory services	100 %
<input type="checkbox"/> (2) Manages investment advisory accounts not involving investment supervisory services	0 %
<input type="checkbox"/> (3) Furnishes investment advice through consultations not included in either service described above	0 %
<input type="checkbox"/> (4) Issues periodicals about securities by subscription	0 %
<input type="checkbox"/> (5) Issues special reports about securities not included in any service described above	0 %
<input type="checkbox"/> (6) Issues, not as part of any service described above, any charts, graphs, formulas, or other devices which client may use to evaluate securities	0 %
<input type="checkbox"/> (7) On more than an occasional basis, furnishes advice to clients on matters not involving securities	0 %
<input type="checkbox"/> (8) Provides a timing service	0 %
<input type="checkbox"/> (9) Furnishes advice about securities in any manner not described above	0 %

(Percentages should be based on applicant's last fiscal year. If applicant has not completed its first fiscal year, provide estimates of advisory billings for that year and state that the percentages are estimates.)

B. Does applicant call any of the services it checked above financial planning or some similar term? Yes No

C. Applicant offers investment advisory services for: (check all that apply)

<input checked="" type="checkbox"/> (1) A percentage of assets under management	<input type="checkbox"/> (4) Subscription fees
<input type="checkbox"/> (2) Hourly charges	<input type="checkbox"/> (5) Commissions
<input type="checkbox"/> (3) Fixed fees (not including subscription fees)	<input type="checkbox"/> (6) Other

D. For each checked box in A above, describe on Schedule F:

- the services provided, including the name of any publication or report issued by the adviser on a subscription basis or for a fee
- applicant's basic fee schedule, how fees are charged and whether its fees are negotiable
- when compensation is payable, and if compensation is payable before service is provided, how a client may get a refund or may terminate an investment advisory contract before its expiration date

2. Types of Clients -- Applicant generally provides investment advice to: (check those that apply)

<input checked="" type="checkbox"/> A. Individuals	<input type="checkbox"/> E. Trusts, estates, or charitable organizations
<input type="checkbox"/> B. Banks or thrift institutions	<input type="checkbox"/> F. Corporations or business entities other than those listed above
<input type="checkbox"/> C. Investment companies	<input type="checkbox"/> G. Other (describe on Schedule F)
<input type="checkbox"/> D. Pension and profit sharing plans	

3. Types of Investments Applicant offers advice on the following: (check those that apply)

- | | |
|--|---|
| <p><input type="checkbox"/> A. Equity securities</p> <p><input type="checkbox"/> (1) exchange-listed securities</p> <p><input type="checkbox"/> (2) securities traded over-the-counter</p> <p><input type="checkbox"/> (3) foreign issuers</p> <p><input type="checkbox"/> B. Warrants</p> <p><input type="checkbox"/> C. Corporate debt securities
(other than commercial paper)</p> <p><input type="checkbox"/> D. Commercial paper</p> <p><input type="checkbox"/> E. Certificates of deposit</p> <p><input type="checkbox"/> F. Municipal securities</p> <p><input type="checkbox"/> G. Investment company securities:</p> <p><input type="checkbox"/> (1) variable life insurance</p> <p><input type="checkbox"/> (2) variable annuities</p> <p><input type="checkbox"/> (3) mutual fund shares</p> | <p><input type="checkbox"/> H. United States governmental securities</p> <p><input type="checkbox"/> I. Options contracts on:</p> <p><input type="checkbox"/> (1) securities</p> <p><input type="checkbox"/> (2) commodities</p> <p><input type="checkbox"/> J. Futures contracts on:</p> <p><input type="checkbox"/> (1) tangibles</p> <p><input type="checkbox"/> (2) intangibles</p> <p><input type="checkbox"/> K. Interests in partnerships investing in:</p> <p><input type="checkbox"/> (1) real estate</p> <p><input type="checkbox"/> (2) oil and gas interests</p> <p><input type="checkbox"/> (3) other (explain on Schedule F)</p> <p><input type="checkbox"/> L. Other (explain on Schedule F)</p> |
|--|---|

4. Methods of Analysis, Sources of Information, and Investment Strategies.

A. Applicant's security analysis methods include: (check those that apply)

- | | |
|--|--|
| <input type="checkbox"/> (1) Charting | <input type="checkbox"/> (4) Cyclical |
| <input type="checkbox"/> (2) Fundamental | <input type="checkbox"/> (5) Other (explain on Schedule F) |
| <input type="checkbox"/> (3) Technical | |

B. The main sources of information applicant uses include: (check those that apply)

- | | |
|--|--|
| <input type="checkbox"/> (1) Financial newspapers and magazines | <input type="checkbox"/> (5) Timing services |
| <input type="checkbox"/> (2) Inspections of corporate activities | <input type="checkbox"/> (6) Annual reports, prospectuses, filings with the Securities and Exchange Commission |
| <input type="checkbox"/> (3) Research materials prepared by others | <input type="checkbox"/> (7) Company press releases |
| <input type="checkbox"/> (4) Corporate rating services | <input type="checkbox"/> (8) Other (explain on Schedule F) |

C. The investment strategies used to implement any investment advice given to clients include: (check those that apply)

- | | |
|--|--|
| <input type="checkbox"/> (1) Long term purchases (securities held at least a year) | <input type="checkbox"/> (5) Margin transactions |
| <input type="checkbox"/> (2) Short term purchases (securities sold within a year) | <input type="checkbox"/> (6) Option writing, including covered options, uncovered options, or spreading strategies |
| <input type="checkbox"/> (3) Trading (securities sold within 30 days) | <input type="checkbox"/> (7) Other (explain on Schedule F) |
| <input type="checkbox"/> (4) Short sales | |

5. Education and Business Standards. Yes No

Are there any general standards of education or business experience that applicant requires of those involved in determining or giving investment advice to clients?.....

(If yes, describe these standards on Schedule F.)

6. Education and Business Background.

For:

- each member of the investment committee or group that determines general investment advice to be given to clients, or
- if the applicant has no investment committee or group, each individual who determines general investment advice given to clients (if more than five, respond only for their supervisors)
- each principal executive officer of applicant or each person with similar status or performing similar functions.

On Schedule F, give the:

<ul style="list-style-type: none"> • name • year of birth 	<ul style="list-style-type: none"> • formal education after high school • business background for the preceding five years
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7. Other Business Activities. (check those that apply)

A. Applicant is actively engaged in a business other than giving investment advice.

B. Applicant sells products or services other than investment advice to clients.

C. The principal business of applicant or its principal executive officers involves something other than providing investment advice.

(For each checked box describe the other activities, including the time spent on them, on Schedule F.)

8. Other Financial Industry Activities or Affiliations. (check those that apply)

A. Applicant is registered (or has an application pending) as a securities broker-dealer.

B. Applicant is registered (or has an application pending) as a futures commission merchant, commodity pool operator or commodity trading adviser.

C. Applicant has arrangements that are material to its advisory business or its clients with a related person who is a:

<ul style="list-style-type: none"> <input type="radio"/> (1) broker-dealer <input checked="" type="radio"/> (2) investment company <input type="radio"/> (3) other investment adviser <input type="radio"/> (4) financial planning firm <input type="radio"/> (5) commodity pool operator, commodity trading adviser or futures commission merchant <input type="radio"/> (6) banking or thrift institution 	<ul style="list-style-type: none"> <input type="radio"/> (7) accounting firm <input type="radio"/> (8) law firm <input type="radio"/> (9) insurance company or agency <input type="radio"/> (10) pension consultant <input type="radio"/> (11) real estate broker or dealer <input type="radio"/> (12) entity that creates or packages limited partnerships
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(For each checked box in C, on Schedule F identify the related person and describe the relationship and the arrangements.) Yes No

D. Is applicant or a related person a general partner in any partnership in which clients are solicited to invest?...

(If yes, describe on Schedule F the partnerships and what they invest in.)

Applicant:
Jensen Investment Management, Inc.

SEC File Number:
801- 32726

Date:
5/7/2008

9. Participation of Interest in Client Transactions.

Applicant or a related person: (check those that apply)

- A. As principal, buys securities for itself from or sells securities it owns to any client.
- B. As broker or agent effects securities transactions for compensation for any client.
- C. As broker or agent for any person other than a client effects transactions in which client securities are sold to or bought from a brokerage customer.
- D. Recommends to clients that they buy or sell securities or investment products in which the applicant or a related person has some financial interest.
- E. Buys or sells for itself securities that it also recommends to clients.

(For each box checked, describe on Schedule F when the applicant or a related person engages in these transactions and what restrictions, internal procedures, or disclosures are used for conflicts of interest in those transactions.)

Describe, on Schedule F, your code of ethics, and state that you will provide a copy of your code of ethics to any client or prospective client upon request.

10. Conditions for Managing Accounts. Does the applicant provide investment supervisory services, manage investment advisory accounts or hold itself out as providing financial planning or some similarly termed services *and* impose a minimum dollar value of assets or other conditions for starting or maintaining an account? Yes No

(If yes, describe on Schedule F.)

11. Review of Accounts. If applicant provides investment supervisory services, manages investment advisory accounts, or holds itself out as providing financial planning or some similarly termed services:

A. Describe below the reviews and reviewers of the accounts. **For reviews**, include their frequency, different levels, and triggers factors. **For reviewers**, include the number of reviewers, their titles and functions, instructions they receive from applicant on performing reviews, and number of accounts assigned each.

Account reviews are conducted by one of Jensen Investment Management's ("Jensen's") Principals/Portfolio Managers on a regular basis. Large accounts are reviewed by the Investment Committee, made up of all the Principals/Portfolio Managers, also on a regular basis. The reviews are based on fundamental analysis of the companies issuing the shares and on periodic communications with clients regarding their investment objectives.

B. Describe below the nature and frequency of regular reports to clients on their accounts.
Clients receive monthly statements only if there is activity in their account, otherwise statements are issued quarterly. The statements are issued by the organization engaged for custody/safekeeping. These statements show cash balances, security positions, dividends and interest collected, and summarize all transactions since the prior statement. If the custodian/safekeeping organization selected by the client does not provide sufficient reporting, Jensen makes separate arrangements with each client. Jensen sends its own account statements every quarter, accompanying each fee statement.

12. Investment or Brokerage Discretion.

A. Does applicant or any related person have authority to determine, without obtaining specific client consent, the:

- | | | |
|--|-----------------------|-----------------------|
| (1) securities to be bought or sold? | Yes | No |
| | <input type="radio"/> | <input type="radio"/> |
| (2) amount of the securities to be bought or sold? | Yes | No |
| | <input type="radio"/> | <input type="radio"/> |
| (3) broker or dealer to be used? | Yes | No |
| | <input type="radio"/> | <input type="radio"/> |
| (4) commission rates paid? | Yes | No |
| | <input type="radio"/> | <input type="radio"/> |

B. Does applicant or a related person suggest brokers to clients? Yes No

For each yes answer to A describe on Schedule F any limitations on the authority. For each yes to A(3), A(4) or B, describe on Schedule F the factors considered in selecting brokers and determining the reasonableness of their commissions. If the value of products, research and services given to the applicant or a related person is a factor, describe:

- the products, research and services
- whether clients may pay commission higher than those obtainable from other brokers in return for those products and services
- whether research is used to service all of applicant's accounts or just those accounts paying for it; and
- any procedures the applicant used during the last fiscal year to direct client transactions to a particular broker in return for products and research services received.

13. Additional Compensation.

Does the applicant or a related person have any arrangements, oral or in writing, where it:

- | | | |
|---|-----------------------|-----------------------|
| A. is paid cash by or receives some economic benefit (including commissions, equipment or non-research services) from a non-client in connection with giving advice to clients? | Yes | No |
| | <input type="radio"/> | <input type="radio"/> |
| B. directly or indirectly compensates any person for client referrals? | Yes | No |
| | <input type="radio"/> | <input type="radio"/> |

(For each yes, describe the arrangements on Schedule F.)

14. Balance Sheet. Applicant must provide a balance sheet for the most recent fiscal year on Schedule G if applicant:

- has custody of client funds or securities (unless applicant is registered or registering only with the Securities and Exchange Commission); or
 - requires prepayment of more than \$500 in fees per client and 6 or more months in advance
- Has applicant provided a Schedule G balance sheet? Yes No

**Schedule F of
Form ADV
Continuation Sheet for Form ADV
Part II**

Applicant: Jensen Investment Management, Inc.	SEC File Number: 801- 32726	Date: 5/7/2008
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(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 Form ADV: Jensen Investment Management, Inc.	IRS Empl. Ident. No.: 93-0978027
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Item of Form (identify)	Answer																		
1D	<p>Jensen Investment Management, Inc.'s ("Jensen's") investment objective is to provide clients real (i.e., inflation-adjusted) growth over long periods of time. Our cornerstone is the belief that this objective can be achieved with the least risk by owning the equity securities of companies which consistently generate high returns on equity over long periods of time. The firm's universe of equities includes companies that have achieved a minimum of 15% return on equity during at least each of the last ten years. Jensen's investment strategy is to invest in approximately 25 high quality common stocks of successful, well managed companies that are believed to be attractively valued and positioned for long term leadership in their industries. As a result, client accounts are non-diversified, meaning that they concentrate their assets in fewer individual holdings than a diversified product, and therefore are more exposed to individual stock volatility than a diversified product. To the extent necessary to satisfy clients' income needs or personal preferences, Jensen will also include income securities in portfolios. Our preferences are short to intermediate term treasury bills and notes, although government agency securities, corporate and municipal bonds, preferred stock, and high yielding equities are occasionally used when the firm believes it is necessary and prudent to do so.</p> <p>Jensen's standard fee schedules for new accounts are as shown below. The quarterly fee shall be one fourth (1/4) of the Annual Fee Rate indicated in each table, using the value of the Investment Account at the end of that quarter. The value of shares of The Jensen Portfolio, or any other mutual fund for which Jensen acts as an investment adviser, held in the Investment Account shall be excluded for purposes of determining the fee.</p> <p>For accounts of individual investors, the fees are:</p> <table border="0"> <thead> <tr> <th style="text-align: left;"><u>Account Value</u></th> <th style="text-align: left;"><u>Annual Fee Rate</u></th> </tr> </thead> <tbody> <tr> <td>First \$5,000,000</td> <td>0.75% (subject to \$37,500 minimum annual fee)</td> </tr> <tr> <td>Next \$5,000,000</td> <td>0.60%</td> </tr> <tr> <td>Over \$10,000,000</td> <td>0.55%</td> </tr> </tbody> </table> <p>A lower minimum (with higher fees) may be assessed for clients in the Pacific Northwest.</p> <p>A lower fee is available for institutional accounts that are generally larger and may require less work for Jensen, as shown below:</p> <table border="0"> <thead> <tr> <th style="text-align: left;"><u>Account Value</u></th> <th style="text-align: left;"><u>Annual Fee Rate</u></th> </tr> </thead> <tbody> <tr> <td>First \$5,000,000</td> <td>0.70%</td> </tr> <tr> <td>Next \$5,000,000</td> <td>0.60%</td> </tr> <tr> <td>Next \$15,000,000</td> <td>0.55%</td> </tr> <tr> <td>Over \$25,000,000</td> <td>0.50%</td> </tr> </tbody> </table>	<u>Account Value</u>	<u>Annual Fee Rate</u>	First \$5,000,000	0.75% (subject to \$37,500 minimum annual fee)	Next \$5,000,000	0.60%	Over \$10,000,000	0.55%	<u>Account Value</u>	<u>Annual Fee Rate</u>	First \$5,000,000	0.70%	Next \$5,000,000	0.60%	Next \$15,000,000	0.55%	Over \$25,000,000	0.50%
<u>Account Value</u>	<u>Annual Fee Rate</u>																		
First \$5,000,000	0.75% (subject to \$37,500 minimum annual fee)																		
Next \$5,000,000	0.60%																		
Over \$10,000,000	0.55%																		
<u>Account Value</u>	<u>Annual Fee Rate</u>																		
First \$5,000,000	0.70%																		
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**Schedule F of
Form ADV
Continuation Sheet for Form ADV
Part II**

Applicant: Jensen Investment Management, Inc.	SEC File Number: 801- 32726	Date: 5/7/2008
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(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 Form ADV: Jensen Investment Management, Inc.	IRS Empl. Ident. No.: 93-0978027
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Item of Form (identify)	Answer												
4B (8)	<p>In addition, a lower minimum and fee are available for accounts where the client has retained the services of another investment advisor who has recommended Jensen to manage at least a portion of their client's assets, which again may require less work for Jensen, as shown below:</p> <table style="margin-left: 40px;"> <thead> <tr> <th style="text-align: left;"><u>Account Value</u></th> <th style="text-align: left;"><u>Annual Fee Rate</u></th> </tr> </thead> <tbody> <tr> <td>First \$1,000,000</td> <td>0.75% (subject to \$7,500 minimum annual fee)</td> </tr> <tr> <td>Next \$1,500,000</td> <td>0.75%</td> </tr> <tr> <td>Next \$2,500,000</td> <td>0.65%</td> </tr> <tr> <td>Next \$5,000,000</td> <td>0.60%</td> </tr> <tr> <td>Over \$10,000,000</td> <td>0.55%</td> </tr> </tbody> </table> <p>In certain instances where Jensen will have minimal servicing responsibilities for the investment advisor's clients and is already managing a substantial amount of assets for clients of the investment advisor, or Jensen believes it has the potential to do so, a lower annual fee rate of 0.50% of the account value may be assessed.</p> <p>In certain circumstances other terms may be negotiated. Fees are billed and due after the end of the calendar quarter to which they apply and are prorated if services are provided for less than a full quarter. Either party may terminate the contract at any time, without cause, upon thirty day's prior written notice to the other party.</p> <p>ADDITIONAL FEE INFORMATION Special account structure requirements, the client's objectives or other special considerations may require a client's fee, in certain instances, to be varied from the basic schedules. Fees may be negotiated in certain circumstances and Jensen reserves the right to waive fees in its discretion and to increase or decrease the minimum account size it will accept.</p> <p>In addition, Jensen's qualitative analysis may include direct contact with suppliers, competitors, employees, and management of portfolio companies.</p>	<u>Account Value</u>	<u>Annual Fee Rate</u>	First \$1,000,000	0.75% (subject to \$7,500 minimum annual fee)	Next \$1,500,000	0.75%	Next \$2,500,000	0.65%	Next \$5,000,000	0.60%	Over \$10,000,000	0.55%
<u>Account Value</u>	<u>Annual Fee Rate</u>												
First \$1,000,000	0.75% (subject to \$7,500 minimum annual fee)												
Next \$1,500,000	0.75%												
Next \$2,500,000	0.65%												
Next \$5,000,000	0.60%												
Over \$10,000,000	0.55%												
4C	<p>While the investment strategy of Jensen is to identify those companies that have the characteristics described in the response to item 1D above and to take a long-term position in those companies, Jensen will constantly monitor companies and will eliminate any company from the portfolio that it believes no longer has the characteristics outlined in Jensen's investment strategy. In addition, the firm manages cash equivalent securities which mature in less than one year.</p>												
5	<p>Members of the investment committee must have a college or graduate degree in accounting, economics or business, or a law degree, or have a business experience equivalency, or be an experienced financial analyst or have equivalent experience in managing or setting strategy for a business.</p>												

**Schedule F of
Form ADV
Continuation Sheet for Form ADV
Part II**

Applicant: Jensen Investment Management, Inc.	SEC File Number: 801- 32726	Date: 5/7/2008
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(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

I. Full name of applicant exactly as stated in Item 1A of Form ADV: Jensen Investment Management, Inc.	IRS Empl. Ident. No.: 93-0978027
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Item of Form (identify)	Answer
	<p>Robert Zagunis (b. 1953), Vice President and Secretary, and Principal, joined the firm in January 1993. Mr. Zagunis serves on the firm's investment committee and is currently chairman of the committee. He received his B.S. from Oregon State University in 1977 with a major in business, a science minor, and a concentration in international trade. He graduated from Stonier Graduate School of Banking (University of Delaware) in 1988. He has 30 years of management and financial services experience, including manager and senior loan officer with First Interstate Bank (1977-1987) and the Bank of California (1987-1993). His experience in commercial lending has covered the full spectrum of business banking situations. He has also served in many capacities in the community.</p> <p>Robert Millen, (b. 1947) Chairman and Principal, joined the firm in July 2000. Mr. Millen serves on the firm's investment committee. He received a B.B.A. degree in Finance from University of Iowa in 1969 and graduated from the Stonier Graduate School of Banking, Rutgers University, in 1981. He has over 35 years of experience in banking and financial services, including Vice President of Principal Financial Group (1997-2000). Mr. Millen's other experience includes serving as Group Vice President for Wellmark Inc. (1990-1997), President of First Interstate Bank NA in Des Moines, Iowa, and senior management positions at Norwest Bank NA, also in Des Moines, Iowa.</p> <p>Eric Schoenstein, (b. 1965) Vice President and Principal, joined the firm in September 2002. Mr. Schoenstein is the Director of Business Analysis and serves on the firm's investment committee. He received a B.S. degree in Business Administration, with a focus in Accounting, from Oregon State University in 1988. He has over 15 years of experience in accounting and financial services, and spent nearly 14 years with Arthur Andersen LLP, most recently as a Senior Audit Manager, providing a wide variety of services to clients of all sizes in both the public and private sectors. His career with Arthur Andersen LLP included time spent in Chicago and Budapest, Hungary, as well as his primary location in Portland, Oregon.</p> <p>Robert McIver, (b. 1965) President and Principal, joined the firm in September 2004. Mr. McIver serves on the firm's investment committee. He received a B.A. (Joint Honors) from the University of Nottingham in 1987 and is a Fellow of the UK's Securities Institute. He has over 20 years business experience, 17 within the banking and investment businesses, including 12 years in London with Schroders Plc. From 1999 to 2001, he served as Chief Investment Officer of the Miami-based Schroder & Co. Trust Bank. From 2001 to 2004, Mr. McIver was located in British Columbia, Canada, where he managed two private companies and served as the inaugural chairman of Tourism Columbia Valley.</p> <p>Kurt Havnaer, (b. 1965) Business Analyst, joined the firm in December 2005. Mr. Havnaer serves on the firm's investment committee. He received a B.A. in Business Administration from the University of Washington in 1988, earned his MBA from Seattle University in 1991 and is a CFA charterholder. He has over 17 years of experience in the investment management industry. Prior to joining Jensen, Mr. Havnaer spent 9 years at Columbia Management Advisors as a high yield analyst and co-portfolio manager. Prior to that, he spent 6 years at Safeco Asset Management as a portfolio manager, analyst and trader.</p>

**Schedule F of
Form ADV
Continuation Sheet for Form ADV
Part II**

Applicant: Jensen Investment Management, Inc.	SEC File Number: 801- 32726	Date: 5/7/2008
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(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 Form ADV: Jensen Investment Management, Inc.	IRS Empl. Ident. No.: 93-0978027
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Item of Form (identify)	Answer
8C	<p>David Mertens, (b. 1960) Vice President and Principal, joined the firm in November 2002. Mr. Mertens is the Director of Sales and Marketing and received a B.S. degree in Radio and Television Communications with a minor in Marketing from Ball State University in 1982. He has over 20 years of industry experience, most recently having served as Senior Vice President of Institutional Marketing with Berger Financial Group LLC, and President of Berger Distributors LLC (1995-2002). He was Regional Vice President of INVESCO Funds Group (1992-1995) and was in sales and marketing roles with two major insurers for 10 years.</p> <p>Brian Ferrie, (b. 1958) Vice President, Treasurer and Chief Compliance Officer, and Principal, joined the firm in July 2003. He received a B.B.A. with a major in Accounting from the University of Texas in 1980. He is a Chartered Financial Analyst (CFA) and a Certified Public Accountant (CPA). Mr. Ferrie has over 20 years of experience in the accounting, compliance and financial services industry, serving as Chief Financial Officer (2001-2003) and Chief Compliance Officer (1994-2001) for Berger Financial Group LLC, investment advisor to the Berger Funds. Prior to that, he served as Director of Internal Audit and Chief Compliance Officer for U.S. Global Investors, investment advisor to the United Services Funds, from 1987 to 1993.</p> <p>Jensen is the sole investment adviser to The Jensen Portfolio, Inc. (the "Fund"), a no-load, nondiversified equity mutual fund which became effective August 3, 1992. Jensen receives an investment advisory fee from the Fund equal to 0.5% per year of the Fund's average daily net assets. Jensen may also receive an expense reimbursement of up to 0.25% per year of the average daily net assets of the Fund's Class J shares, and up to 0.50% per year of the average daily net assets of its Class R shares, for costs incurred in providing distribution and shareholder servicing services to the Fund. The Fund is registered under the Investment Company Act of 1940 and applicable state laws.</p> <p>The Fund has a Prospectus and Statement of Additional Information disclosing facts about the Fund. These documents have been filed with the Securities and Exchange Commission and are available by request to the Fund.</p>
9D	<p>See 8C above. Jensen recommends the Fund to clients for whom the Fund is considered suitable. Jensen does not charge clients any separate management fee on the value of Fund shares owned by the client, because the Fund pays Jensen an investment advisory fee equal to 0.5% per year of the Fund's average daily net assets.</p>
9E	<p>Jensen may invest assets for clients who are related persons as well as for unaffiliated clients. In particular, directors, officers and employees of Jensen (and their family members), as well as directors of the Fund, may themselves be clients of Jensen. Jensen may give advice or exercise investment responsibility or take other actions for some clients (including related persons) that may differ from the advice given, or the timing and nature of actions taken, for other clients, provided that all clients are generally treated on a fair and equitable basis relative to each other, taking into account the differing tax considerations, account sizes, policies and investment restrictions that may be applicable to each client. Some clients may not participate at all in some investments in which other clients participate, or may participate to a different degree or at a different time than other clients.</p>

**Schedule F of
Form ADV
Continuation Sheet for Form ADV
Part II**

Applicant: Jensen Investment Management, Inc.	SEC File Number: 801- 32726	Date: 5/7/2008
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(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 Form ADV: Jensen Investment Management, Inc.	IRS Empl. Ident. No.: 93-0978027
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Item of Form (identify)	Answer
	<p>Directors, officers and employees of Jensen ("Covered Persons") are permitted to purchase and sell for their own accounts the same securities Jensen recommends to its clients, subject to Jensen's <i>Code of Ethics and Statement of Policies</i> (the "Code"), copies of which are available to clients or prospective clients upon request. The Code is designed to detect and limit conflicts of interest and ensure compliance with applicable laws in the conduct of Jensen's business. The Code (i) requires all Covered Persons to avoid serving their own personal interests (or Jensen's) ahead of the interests of Jensen's clients, (ii) prohibits them from taking inappropriate advantage of their position with Jensen, and (iii) requires that they conduct their personal securities transactions in a manner that does not operate adversely to the interests of Jensen's clients. For Covered Persons deemed to have access to nonpublic trading and holdings information for Jensen's clients ("Access Persons"), the Code sets forth procedures, limitations and prohibitions that govern their personal securities transactions in accounts held in their own name as well as accounts in which they have indirect ownership. Although not all Covered Persons fall within the definition of Access Persons, Jensen currently treats all of its Covered Persons as Access Persons under the Code.</p> <p>Access Persons are required to preclear all transactions in securities not otherwise exempt under the Code. Requests for authority to trade will be denied preclearance when the proposed personal transaction would be contrary to the provisions of the Code, including instances where Jensen has purchased or sold the security (or has a pending trade order working for the security) for a client account that day, or the security has been purchased or sold in a client account within the previous 7 days (the "Blackout Period"). The preclearance requirement and Blackout Period do not apply to de minimis personal securities transactions effected by Access Persons in securities of relatively large capitalization companies, as defined in the Code. The Code includes other restrictions and prohibitions on personal trading, such as a ban on short-term trading (i.e., securities cannot be purchased and sold within 60 days at a profit (and for investments in the Fund, this prohibition is extended to 90 days)) and short sales of any security held in a client account, and restrictions on the purchase of securities in an IPO or private placement. The prohibitions of the Code do not apply to certain exempt securities, such as mutual funds (excluding the Fund) and certain short-term debt securities.</p> <p>In addition to the limitations and prohibitions described above, the Code subjects Access Persons to various reporting obligations regarding their personal securities transactions and holdings. The Code is administered and enforced by Jensen, which reviews all reportable transactions for compliance. Violations of the Code are reviewed by Jensen management and may subject such Covered Persons to certain sanctions as deemed appropriate under the circumstances.</p> <p>Jensen's Code also contains policies on insider trading that include procedures designed to prevent trading or communications by Covered Persons that might constitute the misuse of material, nonpublic information.</p> <p>Jensen believes that its Code is reasonably designed to prevent certain personal securities trading-related and other potential conflicts of interest between Jensen (and its Covered Persons) and Jensen's clients. However, clients should be aware that no set of rules can</p>

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Applicant: Jensen Investment Management, Inc.	SEC File Number: 801- 32726	Date: 5/7/2008
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10	possibly eliminate all potential conflicts of interests in trading or other matters.
12A (1,2)	<p>For accounts of individual investors with a value of less than \$5,000,000 the minimum annual fee is \$37,500. It is recommended that these accounts be invested in The Jensen Portfolio. A lower minimum may be assessed for clients in the Pacific Northwest and for institutional and certain other accounts that are generally larger and may require less work for Jensen. In certain circumstances other terms may be negotiated. Jensen reserves the right to waive fees or lower or raise the minimum account size it will accept.</p> <p>Jensen uses the "Jensen Investment Strategy". However, clients may place limitations on Jensen discretion or authority to select the securities or amount of securities to be bought or sold. In addition, Jensen will employ investment strategies which are consistent with the client's stated objectives. Under the investment advisory contracts that Jensen enters into with its clients, Jensen has the authority, subject to any specific client limitations, to determine which securities, and when and how many securities, to purchase or sell for their account.</p> <p>When the same investment decision is made for more than one client account, purchase or sale orders for the security are not required to be combined for execution as a "block" trade unless Jensen believes that one or more such orders have the potential to impact the market. Because of the abundant liquidity and high average daily trading volume associated with the substantial majority of the equity securities purchased by Jensen for its clients, market impact is often not a significant concern. However, the potential for market impact may exist when (i) Jensen's investment committee makes the decision to liquidate or significantly reduce a security position held in all or substantially all of its clients' accounts, (ii) Jensen's investment committee makes the decision to purchase a new security in all or substantially all of its clients' accounts, or (iii) sizeable orders from one or more portfolio managers for the same security in multiple accounts reach the trading desk at approximately the same time.</p> <p>In these circumstances, and often even when market impact is not a significant concern, Jensen will generally combine all client orders given to each broker for execution as a "bunched" or block trade (with the exception of any deminimis orders which may be executed separately prior to either placing the block trade order or filling the remainder of the block trade order). When multiple block trade orders are placed with multiple brokers, the sequence in which brokers are contacted and given the block trade orders is randomly determined using computer software. Execution prices for each block trade are averaged and each account participating in the block trade receives that average price. Partially filled orders for each block trade are allocated pro rata each day in proportion to each participating account's order size. Although Jensen believes that ultimately the ability to participate in block trades will be beneficial to its clients' accounts, in some cases this procedure may adversely affect the price paid or received or the size of the position purchased or sold in an account(s).</p> <p>Jensen may place orders for certain accounts independently of orders for its other managed accounts due to client requests to direct the trades to a specific broker-dealer. The direction of trades may prevent such client's orders from receiving best execution, since trades for these accounts may obtain less favorable price and execution and may be executed at a different time</p>

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12A (3,4) 12B	<p>and under different terms than what is obtained for other clients participating in aggregate/block trades placed by Jensen with another broker. Jensen will be unable to review the effectiveness or value of the services provided by brokers to clients that enter into directed brokerage arrangements, and therefore Jensen does not assume any responsibility for any inconsistency relating to best execution or quality of execution as a result of such direction.</p> <p>Generally, Jensen selects brokers on their perceived ability to obtain best execution. Jensen currently uses Pershing LLC to trade equity securities for the significant majority of its accounts over which it has discretion to choose the broker, consistent with its obligation to seek best execution. Pursuant to that goal, the firm may suggest that clients use a broker or brokers based upon factors of asset safety, the range and quality of services provided to the client, and the reasonableness of commission rates. Reasonableness of commission rates depends upon the amount charged, the broker's ability to execute the trade, and the price at which the broker executes the purchase or sale. Jensen has negotiated what it believes is a favorable commission rate with Pershing LLC. With respect to bond transactions, the firm may compare broker or dealer bids or offers on the basis of best price net to client. If the client's assets are held by a custodian which is not a broker/dealer, and if the client agrees, Jensen may exercise discretion in selecting brokers based on the factors discussed above. Jensen does not recommend broker/dealers to any client or for any transaction unless they meet the criteria described above. Jensen receives no research or services in exchange for recommending brokers to its clients. Clients that have directed their trades to a specific broker-dealer other than Pershing LLC may pay higher commission rates than other clients since Jensen may not be able to negotiate these commissions, and their accounts may be unable or limited in their ability to participate in block trading. Jensen does not enter into any soft dollar arrangements, meaning that it does not use its clients' commissions to pay for and receive investment research from any of its broker-dealers.</p> <p>Jensen may recommend that clients establish brokerage accounts with Pershing Advisor Solutions, a registered broker-dealer and an affiliate of Pershing LLC (together, "Pershing"), to maintain custody of clients' assets and to effect trades for their accounts. Jensen is independently owned and operated and is not affiliated with Pershing. Pershing provides Jensen with access to its institutional trading and custody services, and to its mutual fund supermarket program which allows Jensen to purchase certain mutual funds for its clients (including The Jensen Portfolio (the "Fund")) on a no-transaction fee basis. These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them. Pershing also provides these services to their broker-dealer clients for which Pershing provides clearing and back office services.</p> <p>For Jensen's clients' accounts for which Pershing acts as custodian, Pershing generally does not charge separately for custody but is compensated by account holders through commissions or other transaction related fees for securities trades by the account that are executed through Pershing. Jensen has negotiated what it believes is a favorable commission rate with Pershing. In addition, Jensen's clients do not pay any commission or transaction fee when shares of the Fund are purchased in their account. Furthermore, for Fund shares held at Pershing in Jensen's clients' accounts, the Fund does not pay Pershing the asset-based fee that Pershing charges on</p>

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13A	<p>Fund shares it holds for its other broker-dealer/investment advisor clients who purchase the Fund for their customers through Pershing's mutual fund supermarket program. To the extent that the Fund does not pay Pershing a fee on these Fund shares, it enables the Fund to pay for the distribution and/or shareholder servicing services it receives from other financial intermediaries and to reimburse Jensen for the expenses it incurs in providing distribution and/or shareholder servicing services to the Fund.</p> <p>Pershing also makes available to Jensen other products and services that benefit Jensen but may not directly benefit its clients' accounts. Some of these other products and services assist Jensen in managing and administering clients' accounts. These include software and other technology that provide access to client account data (such as trade confirmations and account statements); facilitate trade execution; provide pricing information and other market data; facilitate payment of Jensen's advisory fees from its clients' accounts; and assist with back-office functions, recordkeeping and client reporting. Some of these services generally may be used to service all or a substantial number of Jensen's accounts, including accounts not maintained at Pershing. Pershing also makes available to Jensen other services intended to help Jensen manage and further develop its business enterprise, including publications on information technology, regulatory compliance and marketing.</p> <p>While as a fiduciary Jensen endeavors to act in its clients' best interests, Jensen's recommendation that clients maintain their assets in accounts at Pershing may be based in part on the benefit to Jensen of the availability of some of the foregoing products, services and arrangements and not solely on the nature, cost or quality of custody and brokerage services provided by Pershing, which may create a potential conflict of interest.</p> <p>Jensen invoices and deducts advisory fees directly from certain clients' accounts. In addition, a related person of Jensen acts as co-trustee for several client accounts. As a result, Jensen is deemed to have custody of the funds and securities in such clients' accounts.</p> <p>Jensen engages in the above activities only in circumstances where we have a reasonable belief that (i) the client's funds and securities are held by a custodian that is a "qualified custodian" under Rule 206(4)-2 under the Investment Advisers Act of 1940 (generally, a bank, savings association or registered broker-dealer), and (ii) the custodian provides at least quarterly account statements to the client or an independent representative identifying the amount of cash and securities in the account at the end of the period and all transactions in the account during the period.</p> <p>Jensen receives certain non-research services from Pershing, as described in response to items 12A(3) and (4), and item 12B, above.</p>

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N/A	<p><u>SUMMARY OF JENSEN'S PROXY VOTING POLICIES</u></p> <p>For those clients who have delegated proxy voting authority to us, Jensen Investment Management, Inc. ("Jensen") provides a voice on behalf of such clients. Jensen views the proxy voting process as an integral part of its relationship with these clients. In regards to how Jensen exercises this authority for securities held in clients accounts, Jensen's proxy voting policies are summarized below.</p> <p><u>Policies of Jensen</u></p> <p>It is Jensen's policy to vote all proxies received for our clients on a timely basis, except that Jensen generally will not vote proxies received for any security where the cumulative market value of the security held in all client accounts managed by Jensen is less than \$250,000. Upon receiving each proxy, Jensen will review the issues presented and make a decision to vote for, against or abstain on each of the issues presented in accordance with the proxy voting guidelines that it has adopted. Jensen will consider information from a variety of sources in evaluating the issues presented in a proxy. Jensen generally supports policies, plans and structures that it believes gives quality management teams appropriate latitude to run the business in a way that is likely to maximize value for owners. Conversely, Jensen generally opposes proposals that clearly have the effect of restricting the ability of shareholders to realize the full potential value of their investment.</p> <p><u>Conflicts of Interest</u></p> <p>Jensen's duty is to vote in the best interests of its clients. Therefore, in situations where there is a conflict of interest between the interests of Jensen and the interests of a client, Jensen will take one of the following steps to resolve the conflict:</p> <ol style="list-style-type: none"> 1. Vote the securities based on a pre-determined voting policy if the application of the policy to the matter presented involves little discretion on the part of Jensen; 2. Disclose the conflict to the client and obtain their direction on how to vote the proxy; or 3. Subject to written approval from the client, vote the securities in accordance with a pre-determined policy based upon the recommendations of an independent third party, such as a proxy voting service. <p><u>More Information</u></p> <p>Information about how Jensen voted proxies with respect to the securities held in a client's account is available to each such client upon request. In addition, clients may also contact us to obtain a copy of the proxy voting policies and procedures that have been adopted by Jensen.</p>

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N/A	<p><u>JENSEN'S PRIVACY POLICY</u></p> <p>The SEC has issued regulations requiring financial institutions, including registered investment advisors, to provide notice to customers regarding their privacy policies and practices.</p> <p>Jensen Investment Management, Inc. ("Jensen") has had a long-standing policy of maintaining strict confidentiality over customer information. Our policy that applies to all people involved with servicing your account(s) at Jensen is as follows:</p> <p><u>Confidentiality and Security</u> All information regarding customer identity, security holdings and financial status will be kept strictly confidential. We maintain physical, electronic and operational safeguards to protect customer nonpublic personal information.</p> <p>We collect nonpublic personal information about our customers from information we receive from your applications or other forms and from information about your transactions with us.</p> <p>We do not disclose any nonpublic personal information about our customers unless:</p> <p>(1) you request or authorize it,</p> <p>(2) the information is needed to complete a transaction that you have initiated, or</p> <p>(3) it is permitted or required by law to law enforcement agencies, the U.S. Securities and Exchange Commission, or other federal or state regulatory agencies.</p> <p>We sometimes find it necessary to provide personal identifiable information about you to entities that provide a service on behalf of Jensen, such as firms that provide reports or custody services on behalf of our customers. These companies are expected to maintain strict privacy and confidentiality policies.</p>

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	<p><u>CLASS ACTION LAWSUITS</u></p> <p>A securities "class action" lawsuit is a civil suit brought by one or more individuals ("Plaintiffs") on behalf of themselves and others who have the same grievance against the issuer of a certain security. When a class action is filed, a written notice of filing and/or settlement is prepared (the "Notice"), which outlines the reasons for the lawsuit, the parameters for qualification as a member of the class and certain legal rights that need to be considered before becoming a member of the class (i.e., participating in the settlement). The Notice is required to be delivered to the owners/beneficiaries of the security by the Claims Administrator (usually the attorney for the Plaintiffs), or by the broker-dealers or other nominees (e.g., custodians) who hold the security on behalf of the owners/beneficiaries.</p> <p>In some cases, in addition to the owner/beneficiary, Jensen may also receive notification of a class action. However, because each class action involves certain legal rights that must be considered by the owner/beneficiary of the security before becoming a member of the class, Jensen does not instruct or give advice to its clients on whether or not to participate as a member of the class and does not automatically file claims on its clients' behalf.</p> <p>If we receive any information intended for our clients pertaining to a class action lawsuit, we will use our reasonable efforts to forward it to them on a timely basis. In addition, if a client notifies Jensen that they intend to participate in a class action lawsuit, upon request we will provide the client the available transaction information on their account with Jensen that is needed by them to file a proof of claim.</p>