

**UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
Washington, DC 20549**

FORM N-Q

**QUARTERLY SCHEDULE OF PORTFOLIO HOLDINGS OF REGISTERED
MANAGEMENT INVESTMENT COMPANY**

Investment Company Act File Number: 811-21724

Registrant Name: Nicholas–Applegate International & Premium Strategy Fund

Address of Principal Executive Offices: 1345 Avenue of the Americas New York, New York 10105

Name and Address of Agent for Service: Lawrence G. Altadonna – 1345 Avenue of the Americas New York, New York 10105

Registrant’s telephone number, including area code: 212-739-3371

Date of Fiscal Year End: February 28, 2010

Date of Reporting Period: November 30, 2009

Form N-Q is to be used by management investment companies, other than small business investment companies registered on Form N-5 (§§ 239.24 and 274.5 of this chapter), to file reports with the Commission, not later than 60 days after the close of the first and third fiscal quarters, pursuant to rule 30b1-5 under the Investment Company Act of 1940 (17 CFR 270.30b1-5). The Commission may use the information provided on Form N-Q in its regulatory, disclosure review, inspection, and policymaking roles.

A registrant is required to disclose the information specified by Form N-Q, and the Commission will make this information public. A registrant is not required to the collection of information contained in Form N-Q unless the Form displays a currently valid Office of Management and Budget (“OMB”) control number. Please direct comments concerning the accuracy of the information collection burden estimate and any suggestions for reducing the burden to the Secretary, Securities and Exchange Commission, 100 F Street, NE, Washington, DC 20549-2001. The OMB has reviewed this collection of information under the clearance requirements of 44 U.S.C. § 3507.

Item 1. Schedule of Investments

Nicholas-Applegate International & Premium Strategy Fund Schedule of Investments

November 30, 2009 (unaudited)

Shares	Value*
COMMON STOCK—97.3%	
Australia—8.4%	
Biotechnology—2.4%	
123,948 CSL Ltd.	\$3,574,894
Commercial Banks—2.2%	
69,164 Commonwealth Bank of Australia	3,334,427
Commercial Services & Supplies—1.0%	
189,217 Downer EDI Ltd.	1,475,942
Food & Staples Retailing—0.6%	
33,495 Woolworths Ltd.	859,346
Metals & Mining—2.2%	
55,687 BHP Billiton Ltd.	2,098,068
18,601 Newcrest Mining Ltd.	626,695
9,801 Rio Tinto Ltd.	640,603
	3,365,366
Belgium—1.0%	
Chemicals—0.6%	
25,259 Tessenderlo Chemie NV	832,285
Oil, Gas & Consumable Fuels—0.4%	
27,391 Euronav NV	586,897
Denmark—2.1%	
Construction & Engineering—0.5%	
9,950 FLSmidth & Co. A/S	649,038
Electrical Equipment—0.2%	
4,800 Vestas Wind Systems A/S (c)	336,953
Pharmaceuticals—1.4%	
31,800 Novo Nordisk A/S, Class B	2,120,408
Finland—1.8%	
Auto Components—0.2%	
13,200 Nokian Renkaat Oyj	334,629
Communications Equipment—1.6%	
178,126 Nokia Oyj	2,359,833

Nicholas-Applegate International & Premium Strategy Fund Schedule of Investments

November 30, 2009 (unaudited)

Shares	Value*
France—7.6%	
Automobiles—0.4%	
14,943 Peugeot S.A. (c)	<u>\$530,507</u>
Commercial Banks—1.5%	
27,495 BNP Paribas	<u>2,282,124</u>
Diversified Telecommunication Services—2.1%	
118,394 France Telecom S.A. (b)	<u>3,078,438</u>
Electric Utilities—0.3%	
9,219 Electricite de France S.A.	<u>532,653</u>
Electrical Equipment—0.9%	
19,616 Alstom S.A.	<u>1,378,021</u>
Media—0.4%	
21,394 Vivendi S.A.	<u>616,792</u>
Oil, Gas & Consumable Fuels—1.5%	
36,497 Total S.A. (b)	<u>2,263,255</u>
Pharmaceuticals—0.5%	
9,794 Sanofi-Aventis S.A.	<u>740,681</u>
Germany—5.9%	
Automobiles—0.7%	
21,187 Daimler AG	<u>1,072,148</u>
Chemicals—1.4%	
34,176 K&S AG	<u>2,062,812</u>
Diversified Financial Services—0.9%	
15,459 Deutsche Boerse AG	<u>1,290,764</u>
Electric Utilities—1.0%	
38,991 E.ON AG	<u>1,542,382</u>
Multi-Utilities—1.0%	
16,213 RWE AG	<u>1,488,315</u>
Pharmaceuticals—0.9%	
17,065 Bayer AG	<u>1,307,042</u>
Greece—0.6%	
Commercial Banks—0.6%	
29,019 National Bank of Greece S.A. (c)	<u>860,002</u>
Hong Kong—3.0%	
Airlines—0.5%	
425,000 Cathay Pacific Airways Ltd. (c)	<u>729,986</u>

Nicholas-Applegate International & Premium Strategy Fund Schedule of Investments

November 30, 2009 (unaudited)

Shares		Value*
Hong Kong—(continued)		
Diversified Telecommunication Services—0.1%		
782,000	Hutchison Telecommunications Hong Kong Holdings Ltd.	\$130,112
Food Products—0.3%		
734,000	First Pacific Co.	426,047
Real Estate Management & Development—2.0%		
204,000	Hang Lung Group Ltd.	1,003,400
159,500	Kerry Properties Ltd.	809,254
592,000	New World Development Ltd.	1,217,900
		<u>3,030,554</u>
Wireless Telecommunication Services—0.1%		
782,000	Hutchison Telecommunications International Ltd. (c)	159,647
Ireland—0.2%		
Insurance—0.2%		
48,618	Irish Life & Permanent PLC (c)	238,468
Italy—2.2%		
Electric Utilities—1.1%		
271,908	Enel SpA	1,631,917
Oil, Gas & Consumable Fuels—1.1%		
66,956	Eni SpA	1,660,783
Japan—14.6%		
Auto Components—0.4%		
29,200	Tokai Rika Co., Ltd.	599,491
Automobiles—1.3%		
48,300	Toyota Motor Corp.	1,907,142
Beverages—0.4%		
34,000	Kirin Holdings Co., Ltd.	555,954
Building Products—0.7%		
29,500	Daikin Industries Ltd.	1,049,771
Commercial Banks—0.6%		
81,900	Resona Holdings, Inc.	873,522
Construction & Engineering—0.4%		
73,000	Kinden Corp.	654,813
Consumer Finance—0.2%		
46,500	Promise Co., Ltd. (c)	310,162
Diversified Telecommunication Services—1.4%		
48,700	Nippon Telegraph & Telephone Corp.	2,103,042
Electronic Equipment, Instruments & Components—0.3%		
27,500	Mitsumi Electric Co., Ltd.	428,393

Nicholas-Applegate International & Premium Strategy Fund Schedule of Investments

November 30, 2009 (unaudited)

Shares		Value*
Japan—(continued)		
Leisure Equipment & Products—2.0%		
50,200	Heiwa Corp.	\$521,887
23,000	Nikon Corp.	415,207
36,200	Sankyo Co., Ltd.	2,036,290
		<u>2,973,384</u>
Machinery—1.1%		
301,000	Hino Motors Ltd. (c)	899,356
36,500	Shima Seiki Manufacturing Ltd.	697,044
		<u>1,596,400</u>
Marine—1.7%		
133,000	Kawasaki Kisen Kaisha Ltd. (c)	385,851
147,000	Mitsui OSK Lines Ltd.	819,931
450,000	Nippon Yusen KK	1,399,519
		<u>2,605,301</u>
Multiline Retail—0.2%		
88,500	Daiei, Inc. (c)	310,985
Pharmaceuticals—0.5%		
11,200	Astellas Pharma, Inc.	412,794
19,700	Daiichi Sankyo Co., Ltd.	385,972
		<u>798,766</u>
Road & Rail—0.4%		
8,600	East Japan Railway Co.	606,622
Software—0.2%		
1,300	Nintendo Co., Ltd.	319,047
Tobacco—0.2%		
81	Japan Tobacco, Inc.	240,406
Trading Companies & Distributors—1.8%		
545,900	Sojitz Corp.	954,053
184,300	Sumitomo Corp. (b)	1,811,644
		<u>2,765,697</u>
Wireless Telecommunication Services—0.8%		
140	KDDI Corp.	758,402
282	NTT DoCoMo, Inc.	427,802
		<u>1,186,204</u>
Norway—3.7%		
Chemicals—1.8%		
63,200	Yara International ASA	2,717,983
Commercial Banks—1.9%		
247,600	DnB NOR ASA (c)	2,796,052

Nicholas-Applegate International & Premium Strategy Fund Schedule of Investments

November 30, 2009 (unaudited)

Shares	Value*
Singapore—0.7%	
Airlines—0.6%	
99,000 Singapore Airlines Ltd.	\$951,601
Transportation Infrastructure—0.1%	
72,270 Singapore Airport Terminal Services Ltd.	133,141
Spain—9.2%	
Commercial Banks—3.0%	
260,361 Banco Santander S.A.	4,481,378
Construction & Engineering—0.3%	
9,343 ACS Actividades Construcciones y Servicios S.A.	465,396
Diversified Telecommunication Services—4.2%	
218,195 Telefonica S.A. (b)	6,271,672
Electric Utilities—1.0%	
162,409 Iberdrola S.A.	1,542,802
Insurance—0.7%	
226,669 Mapfre S.A.	1,001,706
Sweden—2.2%	
Commercial Banks—0.7%	
95,400 Nordea Bank AB	992,233
Personal Products—0.8%	
20,850 Oriflame Cosmetics S.A.	1,228,478
Tobacco—0.7%	
50,600 Swedish Match AB	1,088,170
Switzerland—6.8%	
Chemicals—0.7%	
3,892 Syngenta AG	1,037,023
Electrical Equipment—1.2%	
101,818 ABB Ltd. (c)	1,869,991
Food Products—0.5%	
16,827 Nestle S.A.	795,725
Insurance—2.4%	
16,732 Zurich Financial Services AG	3,620,347
Pharmaceuticals—1.4%	
12,695 Roche Holdings AG	2,074,681
Textiles, Apparel & Luxury Goods—0.6%	
3,280 Swatch Group AG	829,030

Nicholas-Applegate International & Premium Strategy Fund Schedule of Investments

November 30, 2009 (unaudited)

Shares	Value*
United Kingdom—27.3%	
Aerospace & Defense—0.2%	
56,269 BAE Systems PLC	\$303,569
Beverages—1.5%	
130,071 Diageo PLC	2,190,895
Capital Markets—0.3%	
53,500 ICAP PLC	381,198
Commercial Banks—1.8%	
98,123 Barclays PLC	478,361
133,443 Royal Bank of Scotland Group PLC (b)(c)	73,362
88,325 Standard Chartered PLC	2,159,791
	2,711,514
Commercial Services & Supplies—0.6%	
67,923 Aggreko PLC	823,599
Food & Staples Retailing—1.4%	
462,495 WM Morrison Supermarkets PLC (b)	2,093,130
Food Products—2.7%	
135,323 Unilever PLC	3,970,795
Health Care Equipment & Supplies—1.0%	
129,606 SSL International PLC	1,582,528
Industrial Conglomerates—0.3%	
17,062 Cookson Group PLC (c)	108,741
22,313 Smiths Group PLC	350,356
	459,097
Insurance—1.5%	
760,522 Old Mutual PLC (c)	1,421,561
227,246 Standard Life PLC	779,700
	2,201,261
Machinery—0.7%	
84,128 Charter International PLC	1,003,452
Metals & Mining—3.0%	
32,097 Anglo American PLC (c)	1,378,873
67,080 BHP Billiton PLC	2,058,894
22,080 Rio Tinto PLC	1,121,835
	4,559,602
Oil, Gas & Consumable Fuels—5.4%	
302,677 BP PLC	2,866,980
	Royal Dutch Shell PLC (b),
76,148 Class A	2,254,773
104,798 Class B	3,000,015
	8,121,768

Nicholas-Applegate International & Premium Strategy Fund Schedule of Investments

November 30, 2009 (unaudited)

Shares		Value*
United Kingdom—(continued)		
Pharmaceuticals—2.4%		
68,139	AstraZeneca PLC	\$3,047,412
25,592	GlaxoSmithKline PLC	528,571
		<u>3,575,983</u>
Road & Rail—0.5%		
331,510	Stagecoach Group PLC	788,406
Tobacco—1.7%		
59,293	British American Tobacco PLC	1,801,046
27,934	Imperial Tobacco Group PLC	812,065
		<u>2,613,111</u>
Wireless Telecommunication Services—2.3%		
1,536,950	Vodafone Group PLC (b)	3,458,812
	Total Common Stock (cost—\$223,973,798)	<u>145,504,699</u>
RIGHTS (c)—0.2%		
Germany—0.1%		
Chemicals—0.1%		
34,176	K+S AG	114,422
Norway—0.1%		
Commercial Banks—0.1%		
55,022	DnB NOR ASA	155,024
	Total Rights (cost—\$0)	<u>269,446</u>
Principal Amount (000)		
REPURCHASE AGREEMENTS—2.5%		
\$3,785	State Street Bank & Trust Co., dated 11/30/09, 0.01%, due 12/1/09, proceeds \$3,785,001; collateralized by Federal Home Loan Bank, 5.50%, due 7/15/36, valued at \$3,866,063 including accrued interest (cost—\$3,785,000)	3,785,000
	Total Investments before call options written (cost—\$227,758,798)— 100.0%	<u>149,559,145</u>

Nicholas-Applegate International & Premium Strategy Fund Schedule of Investments

November 30, 2009 (unaudited)

Contracts	Value*
CALL OPTIONS WRITTEN (c)—(0.3)%	
955 DAX Index (OTC), strike price €5,959, expires 12/18/09	\$(45,945)
10,100 Dow Jones Euro STOXX 50 Index (OTC), strike price €2,982, expires 12/18/09	(210,340)
4,425 FTSE 100 Index (OTC), strike price £5,526, expires 12/18/09	(117,862)
182,200 Nikkei 225 Index (OTC), strike price ¥10,231, expires 12/11/09	(3,490)
58,050 OMX Stockholm 30 Index (OTC), strike price SEK 998, expires 12/18/09	(45,810)
2,605 S&P/ASX 200 Index (OTC), strike price AUD 4,999, expires 12/17/09	(12,115)
Total Call Options Written (premiums received—\$635,973)	<u>(435,562)</u>
Total Investments net of call options written (cost—\$227,122,825) (a)— 99.7%	<u>149,123,583</u>
Other assets less other liabilities—0.3%	417,283
Net Assets—100.0%	<u>\$149,540,866</u>

Notes to Schedule of Investments:

- * Portfolio securities and other financial instruments for which market quotations are readily available are stated at market value. Market value is generally determined on the basis of last reported sales prices, or if no sales are reported, based on quotes obtained from a quotation reporting system, established market makers, or independent pricing services.

Portfolio securities and other financial instruments for which market quotations are not readily available or for which a development/event occurs that may significantly impact the value of a security, are fair-valued, in good faith, pursuant to procedures established by the Board of Trustees, or persons acting at their discretion pursuant to procedures established by the Board of Trustees. The Fund's investments are valued daily using prices supplied by an independent pricing service or dealer quotations, or by using the last sale price on the exchange that is the primary market for such securities, or the mean between the last quoted bid and ask price for those securities for which the over-the-counter market is the primary market or for listed securities in which there were no sales. Independent pricing services use information provided by market makers or estimates of market values obtained from yield data relating to investments or securities with similar characteristics. Short-term securities maturing in 60 days or less are valued at amortized cost, if their original term to maturity was 60 days or less, or by amortizing their value on the 61st day prior to maturity, if the original term to maturity exceeded 60 days. Investments initially valued in currencies other than U.S. dollar are converted to the U.S. dollar using exchange rates obtained from pricing services. As a result, the net asset value ("NAV") of the Fund's shares may be affected by changes in the value of currencies in relation to the U.S. dollar. The value of securities traded in markets outside the United States or denominated in currencies other than the U.S. dollar may be affected significantly on a day that the New York Stock Exchange ("NYSE") is closed and the NAV may change on days when an investor is not able to purchase or sell shares. The prices used by the Fund to value securities may differ from the value that would be realized if the securities were sold and these differences could be material. The Fund's NAV is normally determined as of the close of regular trading (normally, 4:00 p.m. Eastern time) on the NYSE on each day the NYSE is open for business.

The prices of certain portfolio securities or other financial instruments may be determined at a time prior to the close of regular trading on the NYSE. When fair valuing securities, the Fund may, among other things, consider significant events (which may be considered to include changes in the value of U.S. securities or securities indexes) that occur after the close of the relevant market and before the time the Fund's NAV is calculated. With respect to certain foreign securities, the Fund may fair-value securities using modeling tools provided by third-party vendors. The Fund has retained a statistical research service to assist in determining the fair value of foreign securities. This service utilizes statistics and programs based on historical performance of markets and other economic data to assist in making fair value estimates. Fair value estimates used by the Fund for foreign securities may differ from the value realized from the sale of those securities and the difference could be material. Fair value pricing may require subjective determinations about the value of a security or other asset, and fair values used to determine a Fund's NAV may differ from quoted or published prices, or from prices that are used by others, for the same investments. In addition, the use of fair value pricing may not always result in adjustments to the prices of securities or other assets held by a Fund.

- (a) Securities with an aggregate value of \$145,504,699, representing 97.3% of net assets, were valued utilizing modeling tools provided by a third-party vendor.
- (b) All or partial amount segregated as collateral for call options written.
- (c) Non-income producing.

Glossary:

AUD—Australian Dollar
 €—Euro
 £—Great British Pound
 ¥—Japanese Yen
 OTC—Over-the-Counter
 SEK—Swedish Krona

Other Investments:

- (A) Transactions in call options written for the nine months ended November 30, 2009:

	Contracts	Premiums
Options outstanding, February 28, 2009	451,382	\$1,222,116
Options written	3,361,411	7,035,075
Options terminated in closing transactions	(1,306,371)	(2,375,236)
Options assigned	(327,226)	(656,601)
Options expired	(1,920,861)	(4,589,381)
Options outstanding, November 30, 2009	258,335	\$635,973

Fair Value Measurements

Fair value is defined as the price that would be received to sell an asset or paid to transfer a liability (i.e. the "exit price") in an orderly transaction between market participants. The three levels of the fair value hierarchy are described below:

- Level 1 – quoted prices in active markets for identical investments that the Fund has the ability to access
- Level 2 – valuations based on other significant observable inputs (including quoted prices for similar investments, interest rates, prepayment speeds, credit risk, etc.) or quotes from inactive exchanges
- Level 3 – valuations based on significant unobservable inputs (including the Fund's own assumptions in determining the fair value of investments)

An investment asset's or liability's level within the fair value hierarchy is based on the lowest level input, individually or in the aggregate, that is significant to fair value measurement. The objective of fair value measurement remains the same even when there is a significant decrease in the volume and level of activity for an asset or liability and regardless of the valuation technique used.

The valuation techniques used by the Fund to measure fair value during the nine months ended November 30, 2009 maximized the use of observable inputs and minimized the use of unobservable inputs. When fair-valuing securities, the Fund utilized the estimation of the price that would have prevailed in a liquid market for international equities given information available at the time of evaluation.

The inputs or methodology used for valuing securities are not necessarily an indication of the risk associated with investing in those securities.

A summary of the inputs used at November 30, 2009 in valuing the Fund's assets and liabilities is listed below:

	Level 1 - Quoted Prices	Level 2 - Other Significant Observable Inputs	Level 3 - Significant Unobservable Inputs	Value at 11/30/09
Investments in Securities - Assets:				
Common Stock	—	\$145,504,699	—	\$ 145,504,699
Rights	\$269,446	—	—	269,446
Short-Term Investments	—	3,785,000	—	3,785,000
Total Investments in Securities - Assets	\$269,446	\$149,289,699	—	\$ 149,559,145
Investments in Securities - Liabilities:				
Call Options Written	—	\$ (435,562)	—	\$ (435,562)
Total Investments	\$269,446	\$148,854,137	—	\$ 149,123,583

Item 2. Controls and Procedures

a) The registrant's President & Chief Executive Officer and Treasurer, Principal Financial & Accounting Officer have concluded that the registrant's disclosure controls and procedures (as defined in Rule 30a-3(c) under the Act (17 CFR 270.30a-3(c))), are effective based on their evaluation of these controls and procedures as of a date within 90 days of the filing date of this document.

(b) There were no significant changes in the registrant's internal controls over financial reporting (as defined in Rule 30a-3(d) under the Act (17 CFR 270.30a-3(d))) that occurred during the registrant's last fiscal quarter that has materially affected, or is reasonably likely to materially affect, the registrant's internal control over financial reporting.

Item 3. Exhibits

(a) Exhibit 99.302 Cert. – Certification pursuant to Section 302 of the Sarbanes-Oxley Act of 2002

SIGNATURES

Pursuant to the requirements of the Securities Exchange Act of 1934 and the Investment Company Act of 1940, the registrant has duly caused this report to be signed on its behalf by the undersigned, thereunto duly authorized.

Registrant: Nicholas-Applegate International & Premium Strategy Fund

By /s/ Brian S. Shlissel
President & Chief Executive Officer

Date: January 19, 2010

By /s/ Lawrence G. Altadonna
Treasurer, Principal Financial & Accounting Officer

Date: January 19, 2010

Pursuant to the requirements of the Securities Exchange Act of 1934 and the Investment Company Act of 1940, this report has been signed below by the following persons on behalf of the registrant and in the capacities and on the dates indicated.

By /s/ Brian S. Shlissel
President & Chief Executive Officer

Date: January 19, 2010

By /s/ Lawrence G. Altadonna
Treasurer, Principal Financial & Accounting Officer

Date: January 19, 2010

CERTIFICATIONS

I, Brian S. Shlissel, certify that:

1. I have reviewed this report on Form N-Q of Nicholas-Applegate International & Premium Strategy Fund;
2. Based on my knowledge, this report does not contain any untrue statement of a material fact or omit to state a material fact necessary to make the statements made, in light of the circumstances under which such statements were made, not misleading with respect to the period covered by this report;
3. Based on my knowledge, the schedules of investments included in this report fairly present in all material respects the investments of the registrant as of the end of the fiscal quarter for which the report is filed;
4. The registrant's other certifying officer(s) and I are responsible for establishing and maintaining disclosure controls and procedures (as defined in Rule 30a-3(c) under the Investment Company Act of 1940) and internal control over financial reporting (as defined in Rule 30a-3(d) under the Investment Company Act of 1940) for the registrant and have:
 - (a) Designed such disclosure controls and procedures, or caused such disclosure controls and procedures to be designed under our supervision, to ensure that material information relating to the registrant, including its consolidated subsidiaries, is made known to us by others within those entities, particularly during the period in which this report is being prepared;
 - (b) Designed such internal control over financial reporting, or caused such internal control over financial reporting to be designed under our supervision, to provide reasonable assurance regarding the reliability of financial reporting and the preparation of financial statements for external purposes in accordance with generally accepted accounting principles;
 - (c) Evaluated the effectiveness of the registrant's disclosure controls and procedures and presented in this report our conclusions about the effectiveness of the disclosure controls and procedures, as of a date within 90 days prior to the filing date of this report, based on such evaluation; and
 - (d) Disclosed in this report any change in the registrant's internal control over financial reporting that occurred during the registrant's most recent fiscal quarter that has materially affected, or is reasonably likely to materially affect, the registrant's internal control over financial reporting; and
5. The registrant's other certifying officer(s) and I have disclosed to the registrant's auditors and the audit committee of the registrant's board of directors (or persons performing the equivalent functions):
 - (a) All significant deficiencies and material weaknesses in the design or operation of internal control over financial reporting which are reasonably likely to adversely affect the registrant's ability to record, process, summarize, and report financial information; and
 - (b) Any fraud, whether or not material, that involves management or other employees who have a significant role in the registrant's internal control over financial reporting.

Date: January 19, 2010

Signature & Title: /s/ Brian S. Shlissel

Brian S. Shlissel

President & Chief Executive Officer

CERTIFICATIONS

I, Lawrence G. Altadonna, certify that:

1. I have reviewed this report on Form N-Q of Nicholas-Applegate International & Premium Strategy Fund;
2. Based on my knowledge, this report does not contain any untrue statement of a material fact or omit to state a material fact necessary to make the statements made, in light of the circumstances under which such statements were made, not misleading with respect to the period covered by this report;
3. Based on my knowledge, the schedules of investments included in this report fairly present in all material respects the investments of the registrant as of the end of the fiscal quarter for which the report is filed;
4. The registrant's other certifying officer(s) and I are responsible for establishing and maintaining disclosure controls and procedures (as defined in Rule 30a-3(c) under the Investment Company Act of 1940) and internal control over financial reporting (as defined in Rule 30a-3(d) under the Investment Company Act of 1940) for the registrant and have:
 - (a) Designed such disclosure controls and procedures, or caused such disclosure controls and procedures to be designed under our supervision, to ensure that material information relating to the registrant, including its consolidated subsidiaries, is made known to us by others within those entities, particularly during the period in which this report is being prepared;
 - (b) Designed such internal control over financial reporting, or caused such internal control over financial reporting to be designed under our supervision, to provide reasonable assurance regarding the reliability of financial reporting and the preparation of financial statements for external purposes in accordance with generally accepted accounting principles;
 - (c) Evaluated the effectiveness of the registrant's disclosure controls and procedures and presented in this report our conclusions about the effectiveness of the disclosure controls and procedures, as of a date within 90 days prior to the filing date of this report, based on such evaluation; and
 - (d) Disclosed in this report any change in the registrant's internal control over financial reporting that occurred during the registrant's most recent fiscal quarter that has materially affected, or is reasonably likely to materially affect, the registrant's internal control over financial reporting; and
5. The registrant's other certifying officer(s) and I have disclosed to the registrant's auditors and the audit committee of the registrant's board of directors (or persons performing the equivalent functions):
 - (a) All significant deficiencies and material weaknesses in the design or operation of internal control over financial reporting which are reasonably likely to adversely affect the registrant's ability to record, process, summarize, and report financial information; and
 - (b) Any fraud, whether or not material, that involves management or other employees who have a significant role in the registrant's internal control over financial reporting.

Date: January 19, 2010

Signature & Title: /s/ Lawrence G. Altadonna

Lawrence G. Altadonna
Treasurer, Principal Financial &
Accounting Officer
