

**VALIC COMPANY I**

*Supplement to Statement of Additional Information dated October 1, 2009*

In the section titled “**Portfolio Managers**” under the heading “**Other Accounts**,” beginning on page 46, the chart is amended to reflect the addition of Darin Turner as a portfolio manager of Invesco Aim Capital Management, Inc. responsible for managing a portion of the Global Real Estate Fund.

<u>Fund</u>	<u>Advisers/ Sub-adviser</u>	<u>Portfolio Manager</u>	<b>Other Accounts</b> (As of July 31, 2009)					
			<u>Registered Investment Companies</u>		<u>Pooled Investment Vehicles</u>		<u>Other Accounts</u>	
			<u>No. of Accounts</u>	<u>Assets (\$ millions)</u>	<u>No. of Accounts</u>	<u>Assets (\$millions)</u>	<u>No. of Accounts</u>	<u>Assets (\$millions)</u>
Global Real Estate Fund	Invesco Aim	Turner, Darin	0	0	24	\$44.7	0	0

**Date:** December 9, 2009