


**CERTIFICATE OF COMPLIANCE WITH NEW YORK PUBLIC PENSION  
FUND REFORM CODE OF CONDUCT**

Freeman Spogli & Co. (together with its affiliates, "Freeman Spogli") hereby certifies to each of the public pension funds listed on Appendix 1 (the "Public Pension Fund") as follows with respect to Freeman Spogli's compliance with the New York Attorney General's Public Pension Fund Reform Code of Conduct (the "Code of Conduct"). Capitalized terms used in this certificate and not defined herein will have the meanings given to them in the Code of Conduct.

1. Attached hereto as Exhibit A is the information required to be disclosed to the Public Pension Fund by Freeman Spogli pursuant to paragraph 8 of the Code of Conduct.
2. Freeman Spogli has adopted procedures reasonably designed to cause Freeman Spogli to comply with the Code of Conduct. Such procedures are in full force and effect and Freeman Spogli is in compliance therewith as of the date of this certificate.

Dated As of July 29, 2011  
FREEMAN SPOGLI & CO.

By:   
Name: William M. Wardlaw  
Title: Partner

## EXHIBIT A

Set forth below is the name and title of each Executive Officer of Freeman Spogli and Lou Losorelli, who along with the Executive Officers, is responsible for communicating with Public Pension Funds.

<u>Name</u>	<u>Title</u>
Bradford M. Freeman	Chairman
Ronald P. Spogli	Chief Executive Officer
John M. Roth	President and Chief Operating Officer
Brad J. Brutocao	Vice President
Benjamin D. Geiger	Vice President
Todd W. Halloran	Vice President
Jon D. Ralph	Vice President
J. Frederick Simmons	Vice President and Treasurer
William M. Wardlaw	Vice President and Secretary
Lou Losorelli	Chief Financial Officer

- (a) None of the above individuals is a current or former Official, Public Pension Official, Public Pension Fund Advisor, or Public Pension Plan Fiduciary or employee, advisor, or a Relative of any such person.
- (b) Most of the individuals listed above have met with, and made presentations to, Public Pension Fund Officials of the Public Pension Fund and the Public Pension Fund Advisor, if any, to the Public Pension Fund.
- (c) None of the individuals listed in the chart above has been registered as a Lobbyist with any state or the federal government in the past two years.
- (d) As of July 1, 2011, John Roth was made President and Chief Operating Officer of Freeman Spogli, and Ronald Spogli became Chief Executive Officer.
- (e) Freeman Spogli certifies that the information set forth above is accurate.

## **APPENDIX 1**

1. California Public Employees' Retirement System
2. California State Teachers' Retirement System
3. Florida Retirement System Trust Fund
4. New York City Employees' Retirement System
5. New York City Fire Department Pension Fund
6. New York City Police Pension Fund
7. New York State Common Retirement Fund
8. Pension Reserves Investment Trust Fund
9. Public Employees Retirement System of Ohio
10. School Employees Retirement Board of Ohio
11. State of Connecticut Retirement Plans and Trust Funds
12. State Teachers Retirement System of Ohio
13. Teachers' Retirement System of the City of New York