

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 the New York State Common Retirement Fund ("New York Common") 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 New York Common by Freeman Spogli pursuant to paragraph 9 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: July 29, 2011

FREEMAN SPOGLI & CO.

By:



Name: William M. Wardlaw

Title: Partner

EXHIBIT A

Set forth below is the name and address of the only third party that Freeman Spogli compensated in any way in connection with the investment by New York Common as required by paragraph 9 of the Code of Conduct.

Name	Address	Amount of Compensation
O'Melveny & Myers LLP	1999 Avenue of the Stars Suite 700 Los Angeles, CA 90067	\$22,160