

---

---

**MEMORANDUM**

---

---

**TO:** PUBLIC PENSION FUND CLIENTS

**FROM:** PACIFIC CORPORATE GROUP HOLDINGS, LLC, PACIFIC CORPORATE GROUP, LLC

**SUBJECT:** SEMI ANNUAL DISCLOSURE OF INVESTMENT PERSONNEL

**DATE:** 7/31/11

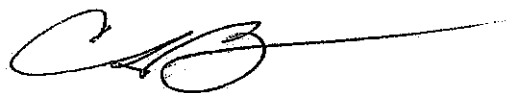
---

In connection with Pacific Corporate Group Holdings, LLC's adoption of the Public Pension Fund Reform Code of Conduct created by New York Attorney General Andrew Cuomo, the following personnel may communicate with Public Pension Fund clients:

Name	Title	Job Duties	Former Official or Relative?	Registered Lobbyist?
Bower, Christopher	CEO	Management of PCGH	No	No

I hereby certify that the foregoing information is accurate and complete:

**Pacific Corporate Group Holdings, LLC**



By: \_\_\_\_\_  
Christopher J. Bower  
Chief Executive Officer