
MEMORANDUM

TO: PUBLIC PENSION FUND CLIENTS
FROM: PCG CAPITAL PARTNERS, LLC ("PCG CP")
SUBJECT: SEMI ANNUAL DISCLOSURES
DATE: 1/31/12

Investment Personnel

In connection with PCG CP'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	Managing Member	Management of PCG CP	No	No

Political Contributions

PCG CP's Executive Officers and Relatives of Executive Officers did not make Contributions during the prior calendar year.

PCG CP hereby certifies that the foregoing information is accurate and complete:

PCG Capital Partners, LLC

By: 
Christopher J. Bower
Managing Member