FRESNO COUNTY EMPLOYEES' RETIREMENT ASSOCIATION COMPLIANCE EVALUATION REPORT 4th QUARTER 2007

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Executive Summary 4th Quarter 2007

This report covers Wurts & Associates' evaluation of the investments within the portfolios relative to the Fresno County Employees' Retirement Association's (Association) Investment Policy and Guidelines (Guidelines). It contains a compliance worksheet summary of the investments evaluated, the private and public managers' representations regarding compliance, and a detailed compliance worksheet specifying the scope of each evaluation.

The Association's portfolio is comprised of both commingled vehicles and separate accounts. All of the separate account managers employed by the Association have specific language within the Guidelines for Wurts & Associates to evaluate. Please refer to Exhibit A which is a table summarizing the managers employed by the Association, the type of investment vehicle used by each, the general asset class of the investment, and whether or not the Guidelines contain specific language.

Investments made by managers using a commingled vehicle are typically governed by a partnership agreement or prospectus. The reason for this is that since commingled investment vehicles are designed to accommodate many different investors, only one common document may govern the investment strategy.

Public Market Managers

All managers employed by the Association that manage publicly traded securities have specific language in the Guidelines. Wurts & Associates has evaluated each manager's compliance relative to these guidelines and they are contained in this report. Grantham, Mayo, Van Otterloo & Company (GMO), Mondrian Investment Partners Limited, and State Street Global Advisors are employed through the usage of a commingled fund. The investment policies of these managers shall be governed by their prospectuses.

Private Market Managers

Private Market Investment Managers are given full discretion within the scope of their assigned segment, governed by their Limited Partnership Agreements. All private equity managers employed by the Association are made through commingled vehicles and none of them has specific language in the Guidelines to evaluate. All have warranted that they have complied with the appropriate governing authority over their investment strategy. Wurts & Associates is unable to verify this compliance.

Real Estate Managers

The Real Estate Investment Managers employed are given full discretion within the scope of the relevant language that governs the investment strategy. None of them has specific language in the Guidelines to evaluate. All have warranted that they have complied with the appropriate governing authority over their investment strategy. Wurts & Associates is unable to verify this compliance.

Summary of Findings

Of the managers employed by the Association that have specific guidelines, Wurts & Associates has determined the following:

	In	Out of
Manager	Compliance	Compliance
Aronson + Johnson + Ortiz	✓	
Artisan Partners Limited Partnership	✓	
Brandywine Asset Management	✓	
Kalmar Investments Inc.	✓	
Wellington Capital Management	✓	
Enhanced Investment Technologies (INTECH)	✓	
TCW Asset Management Company	✓	
State Street Global Advisors	✓	
Mondrian Investment Partners Limited	✓	
Oechsle International	✓	
Franklin Templeton (International)	✓	
BlackRock, Inc.	✓	
Weiss, Peck & Greer	✓	
Bradford & Marzec	~	
Loomis Sayles	~	
Grantham, Mayo & van Otterloo	~	

During the quarter three managers' guidelines were revised (Artisan Partners, INTECH, and Wellington Capital Management) per Wurts & Associates' recommendation and FCERA's approval. We are pleased to report this quarter that there were no material breaches of any consequence by any of the managers we audit.

Jeffrey MacLean

President & Chief Operating Officer

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Disclaimer

Wurts & Associates, Inc. has exercised all reasonable professional care in the evaluation of the each investment manager's compliance to the Investment Policy and Guidelines of the Fresno County Employees' Retirement Association as of December 31, 2003. This report is provided to the Board of Trustees in conjunction with our responsibilities under the investment consulting agreement. Our professionals necessarily relied on data provided by third parties (e.g., Bloomberg, Advent, custodian banks) to perform our evaluation. Wurts & Associates makes no claims as to the accuracy of the data used in this evaluation and shall not be held liable for damages caused by errors or omissions in content, except to the extent arising from our sole gross negligence.

Exhibit A

Investment			Enforcable
Investment Manager	Vehicle	General Asset Class	Guidelines
Aronson + Johnston + Ortiz	Separate Account	Public Market (Equity)	Yes
Artisan Partners Limited Partnership	Separate Account	Public Market (Equity)	Yes
Brandywine Asset Management	Separate Account	Public Market (Equity)	Yes
Kalmar Investments Inc.	Separate Account	Public Market (Equity)	Yes
Wellington Capital Management	Separate Account	Public Market (Equity)	Yes
Enhanced Investment Technologies (INTECH)	Separate Account	Public Market (Equity)	Yes
TCW Asset Management Company	Separate Account	Public Market (Equity)	Yes
State Street Global Advisors	Commingled Fund	Public Market (Equity)	No
Mondrian Investment Partners Limited	Commingled Fund	Public Market (Equity)	No
Oechsle International	Separate Account	Public Market (Equity)	Yes
Franklin Templeton (International)	Separate Account	Public Market (Equity)	Yes
BlackRock, Inc.	Separate Account	Public Market (Fixed Income)	Yes
Weiss, Peck & Greer	Separate Account	Public Market (Fixed Income)	Yes
Bradford & Marzec	Separate Account	Public Market (Fixed Income)	Yes
Loomis Sayles	Separate Account	Public Market (Fixed Income)	Yes
Grantham, Mayo, Van Otterloo & Co	Commingled Fund	Public Market (Fixed Income)	No
Heitman / JMB Real Estate III, IV & V	Commingled Fund	Real Estate	No
Heitman / JMB Group Trust V	Commingled Fund	Real Estate	No
Sentinel Real Estate Corp.	Commingled Fund	Real Estate	No
TA Associates II, IV, & V	Commingled Fund	Real Estate	No
BCI Fund V	Commingled Fund	Private Market	No
The Blackstone Group (Private Equity)	Commingled Fund	Private Market	No
Blackstone Alternative Asset Management (Hedge Fund of Funds)	Commingled Fund	Private Market	No
DT Capital Partners	Commingled Fund	Private Market	No
Landmark	Commingled Fund	Private Market	No
Lonestar	Commingled Fund	Private Market	No
New Mountain	Commingled Fund	Private Market	No
TCW Fund III & IV	Commingled Fund	Private Market	No
Warburg Fund & Warburg Fund VIII	Commingled Fund	Private Market	No
JER Fund I & II	Commingled Fund	Real Estate	No

Client: Fresno County Employees Retirement Association

Analysis Date: December 31, 2007

Asset Class: Domestic Equity

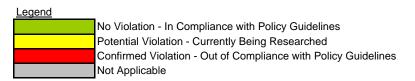
			Diversification: at	Commercial Paper	Weighted Avg Market	
Manager	Style	Market Cap Weighting	Market	Rating	Cap	Allowable Securities
Aronson + Johnson + Ortiz	M/LV					
Artisan Partners Ltd.	SG					
Brandywine Asset Mgmt.	SV					
Kalmar Investments Inc.	SG					
Wellington Management Co.	LV					
TCW Asset Management Company	LG					
Enhanced Investment Technologies (INTECH)	LG					
State Street Global Advisors	LG(p)					

Asset Class: International Equity

Manager		Market Cap Weighting	Diversification: at Market	Commercial Paper Rating	Weighted Avg Market Cap	Allowable Securities
Oechsle International	INT					
Franklin Templeton Cos.	INT					
Mondrian Investment Partners Limited	INT					

Asset Class: Domestic Fixed Income

			Diversification: at		Commercial Paper		
Manager		Bond Quality	Market	Duration	Rating	Derivatives Restricted	Prohibited Securities
BlackRock, Inc.	CP						
Bradford & Marzec, Inc.	CP						
Loomis, Sayles & Co.	CP						
Western Asset Management Company	CP						
Grantham, Mayo, Van Otterloo & Co.	GB						





Brandywine Global Investment Management, LLC 2929 Arch Street, 8th Floor / Philadelphia, PA 19104 800 348 2499 / 215 609 3500 / brandywineglobal.com

January 18, 2008

Mr. Tony Ferrara Wurts & Associates 2321 Rosecrans, Suite 2250 El Segundo, CA 90245

Dear Mr. Ferrara:

Please accept this letter as a confirmation that Brandywine Global Investment Management LLC is in compliance with the attached guidelines and mandates for Fresno County Employees' Retirement Association with an effective date as of August 2003 from the period beginning 10/1/2007 and ending 12/31/2007.

Sincerely,

Steve Tonkovich

Managing Director/Portfolio Manager

Am m Am

Enclosure

cc: Roberto Pena, FCERA

Guidelines & Objectives Diversified Small Cap Value Equity

Investment Style	U.S. Small Cap Value Equity		
Investment Objective	To out-perform the investment benchmark over a 3-5 year period, while maintaining a portfolio with consistent small cap value characteristics.		
Investment Benchmark	Russell 2000 Value Index		
	The portfolio will generally:		
	Invest in U.S. small cap and micro cap companies with value characteristics such as low price-to-earnings or low price-to- book ratios.		
	Maintain a widely diversified portfolio of small and micro cap holdings.		
	Maintain cash at no more than 5%, with up to 10% transitional cash. Exchange traded funds (ETFs) may be used to equitize cash positions in the portfolio, particularly during portfolio contributions and withdrawals.		
	Limit investment in any single:		
Investment Guidelines	 Company to 2% of the portfolio at purchase; 		
	o Industry to 20% of the portfolio at purchase; and		
	 Sector to 35% of the portfolio at purchase. 		
	❖ Not purchase:		
	o ADR's;		
	o Non-U.S. companies unless included in the Russell 3000;		
	o Rule 144A securities; or		
	o Derivatives to leverage the portfolio.		
	❖ Not engage in short sales		

215/546-7500 215/546-7506 FAX ajopartners.com

January 8, 2008

AJ⊕

Mr. Tony Ferrara Wurts & Associates Inc. 2321 Rosecrans Avenue Suite 2250 El Segundo, California 90245

Re: FRESNO COMPLIANCE

Dear Tony:

We're pleased to certify:

The portfolio managed for the Fresno County Employees' Retirement Association remained in compliance with all investment guidelines from October 1, 2007, to December 31, 2007.

We welcome your questions.

Sincerely,

Joseph F. Dietrick dietrick@ajopartners.com

eja (FX)

cc: Roberto L. Peña



Grantham, Mayo, Van Otterloo & Co. LLC 40 Rowes Wharf • Boston, MA 02110 T: (617) 330-7500 • F: (617) 261-0134 • www.gmo.com

January 10, 2008

Mr. Scott Garrett Wurts & Associates 2321 Rosecrans, Suite 2250 El Segundo, California 90245

Re:

Compliance Certification for the Fresno County Employees Retirement Association's (the "Fund's") Investment in GMO Global Bond Fund, a Series of GMO Trust

Dear Mr. Garrett:

On behalf of Grantham, Mayo, Van Otterloo & Co. LLC ("GMO"), I hereby certify that during the review period of October 1, 2007 through December 31, 2007 the GMO Global Bond Fund was in compliance with the investment restrictions set forth in the GMO Trust Prospectus dated June 30, 2007 and the Statement of Additional Information.

Please do not hesitate to contact me at 617-790-5049 if you have any questions.

Sincerely,

Mark A. Mitchelson

The a. The

Compliance Specialist

cc: Roberto Pena, FCERA



February 7, 2007

Mr. Tony Ferrara Consulting Associate Wurts & Associates, Inc. 2321 Rosecrans Avenue, Suite 2250 El Segundo, California 90245

Re: Fresno CERA

Dear Mr. Ferrara:

This letter is to certify that to the best of our knowledge, the investment portfolio managed on behalf of the Fresno County Employees' Retirement Association was in compliance with stated investment objectives, policies and guidelines during the fourth quarter of 2007.

Please contact me at (626) 844-4046 should you have any questions.

Tapae.

Sincerely,

Kalisa Falzone Compliance Officer



LANDMARK PARTNERS

February 4, 2008

Mr. Anthony Ferrara Wurts & Associates 2321 Rosecrans Suite 2250 El Segundo, CA 90245

Dear Mr. Ferrara:

This letter is to formally notify the Board of Trustees of the Fresno County Employees Retirement Association that for the period beginning October 1, 2007 and ending December 31, 2007, the management of their portfolio investment in Landmark Equity Partners X, LP is in compliance with the guidelines as indicated in the Amended and Restated Partnership Agreement dated June 23, 2000.

Sincerely,

Landmark Equity Advisors LLC

Tina St. Pierre Vice President

cc: Mr. Roberto Peña, FCERA

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TRUST COMPANY OF THE WEST

865 SOUTH FIGUEROA STREET, LOS ANGELES, CALIFORNIA 90017
TEL: 213 244 0050 FAX: 213 244 0499 E-MAIL: garrett.walls@tcw.com

GARRETT A. WALLS GROUP MANAGING DIRECTOR



January 15, 2008

Mr. Anthony Ferrara Wurts & Associates 2321 Rosecrans Avenue, Suite 2250 El Segundo, CA 90245

Dear Mr. Ferrara:

To the best of our knowledge, based upon TCW's routine Compliance Department monitoring procedures and the representations made to me by the portfolio manager of the Fresno County Employees' Retirement Association ("FCERA") Concentrated Core Equity account, the account has been in material compliance with the account guidelines for the calendar quarter ended December 31, 2007 (except for any matters that FCERA has noted to us and any matters that we have otherwise reported to FCERA).

If you have any questions, please do not hesitate to contact me at (213) 244-0050.

Sincerely.

/bvf

cc: Mr. Roberto Pena, Fresno County Employees' Retirement Association

Mr. Paul Douglas, Trust Company of the West

BLACKROCK

January 22, 2008

COMPLIANCE CERTIFICATION

BlackRock performs compliance checks daily on the Fresno County Employees' Retirement Association, FCERA ("Client") account and, if necessary, BlackRock rebalances or otherwise takes such action for the account to ensure compliance with the relevant investment policies and guidelines applicable to the account that have been previously communicated to us and are currently in effect for the account ("Guidelines"). Therefore, and on that basis, for the period from October 1, 2007 to December 31, 2007, the Client's account has been in compliance, in all material respects, with its Guidelines.

BLACKROCK

By:

Andrew Novak

Managing Director



January 16, 2008

Wurts & Associates Inc. 2321 Rosecrans Avenue Suite 2250 El Segundo, CA 90245

Attn: Anthony Ferrara

Dear Anthony,

On behalf of Mondrian Investment Partners Limited (Investment Manager for the Mondrian Emerging Markets Equity Fund, L.P. ("Fund")), I certify the Fund is in compliance with its stated investment objectives and strategies, as described in the Confidential Information Memorandum.

Sincerely,

Andrew Miller

Senior Portfolio Manager



Fresno County Employees' Retirement Association Certification of Compliance Statement Fourth Quarter, 2007

This statement is to verify that to the best of our knowledge and based upon Wellington Management's systems, all transactions and positions in Fresno County Employees' Retirement Association's Research Value portfolio for the period October 1, 2007 – December 31, 2007, have been reviewed and are in compliance with the investment management agreement and Wellington Management's internal policies.

Note: The Fresno County Employees' Retirement Association Research Value Portfolio held a position in Rolls Royce ADR, which was not in compliance with the investment guidelines in place. The Retirement Board and the consultant were informed about the compliance flag. The Board subsequently approved the holding of the Rolls Royce security at its September 5, 2007 Board meeting. Also, the investment guidelines were modified to allow the Fresno County Employees' Retirement Association Research Value Portfolio to transact on over-the-counter markets.

Sue Bonfeld

Vice President

Wellington Management

SR Sonfeld

12/31/2007

Date

COMPLIANCE WITH INVESTMENT GUIDELINES

Investment Manager Name:	Artisan Partners Limited Partnership
Account Name:	Fresno County Employees Retirement Association
Quarter Ending:	December 31, 2007
	ce with the Investment Guidelines for the Fresno ciation portfolio during the quarter specified above.
	liance with all the Investment Guidelines during the e a summary of any guideline deviations and a brief
By: Name: Brooke J. Billick Title: Chief Compliance Officer an Date: January 17, 2008	d Associate Counsel



Oechsle International Advisors, LLC

Tony Ferrara Wurts & Associates 999 Third Avenue Seattle WA, 98104

January 9, 2008

Re: Compliance with Investment Guidelines for Fresno County

This statement is to confirm that the assets invested by Oechsle International Advisors, LLC ("Oechsle") were managed in accordance with the Account's Investment Guidelines for the fourth quarter October 1, 2007 through December 31, 2007.

Oechsle agrees and acknowledges that the Account will continue to be managed according to the Investment Guidelines. If you have any questions, please do not hesitate to contact me at 617-330-8825.

Regards,

Paul Kelly

Compliance Officer



Fresno County Employees Retirement Association **Investment Guidelines Certification Statement**

Certification of Investment Manager

To the best of our knowledge, the undersigned investment manager certifies that its investment decisions have stayed within the restrictions outlined in accordance with the provisions of the Board's Investments Policy Statement and Investment Guidelines agreed upon on May 27, 2004.

Signature: Nancy Romito

By:

Nancy Romito

Title: Client Services Director

Firm: Kalmar Investments Inc.

Date: January 14, 2008

Reporting Period: Fourth Quarter 2007



January 23, 2008

Mr. Anthony Ferrara
Wurts & Associates
2321 Rosecrans
Suite 2250
El Segundo, CA 90245
Via e-mail: aferrara@wurts.com

Re: Fresno County Employees' Retirement Association (I0240LG.240) ("Portfolio")

Dear Mr. Ferrara:

The purpose of this correspondence is to certify that for the period October 1, 2007, through December 31, 2007, INTECH has complied with the Portfolio's Manager Specific Guidelines as amended. Thank you for all of your assistance with amending the Portfolio's Guidelines to match INTECH's investment process.

Please contact me should you have any questions.

Sincerely,

Patricia Flynn

Chief Compliance Officer

cc: Robert Pena, Retirement Administrator (via e-mail: rpena@co.fresno.ca.us)

Compliance Worksheet 12-31-2007

Domestic Equity Accounts 12/31/2007

Aronson + Johnson + Ortiz	
Guideline	In Compliance
No single equity position > 5% of company's total market cap	Yes
≤ 7% per issue at market	Yes
All commercial paper obligations to have min. rtgs. of P-2 (Moody's) or A-2 (S&P's)	Yes
Weighted average market cap should not fall below \$5B	Yes
No derivatives, non-AD foreign stocks without consent of Association	Yes

Artisan Partners Limited Partnership	
·	In Compliance
No single equity position > 5% of that company's total market cap	Yes
≤ 7% per issue at market	Yes
Initial position mkt caps shall be between \$100M and \$2.5B	Yes ¹
No derivatives, non-ADR foreign stocks, non-U.S. jurisdictional	Yes

Brandywine Asset Management	
Guideline	In Compliance
No single equity position > 5% of company's total market cap	Yes
≤ 5% per issue at market	Yes
All commercial paper obligations to have min. rtgs. of P-2 (Moody's) or A-2 (S&P's)	Yes
Weighted average market cap should be +/-30% of Russell 2000 Value Index w/o notification	Yes
No derivatives, non-ADR foreign stocks without consent of Association	Yes

Kalmar Investments Inc.		
	In Compliance	
No single equity position > 5% of that company's total market cap	Yes	
≤ 8% per issue at market	Yes	
All commercial paper obligations to have min. rtgs. of P-2 (Moody's) or A-2 (S&P's)	Yes	
Initial position caps shall be between \$100M and \$2B	Yes ²	
No derivatives, non-ADR foreign stocks, non-U.S. jurisdictional	Yes	

¹Artisan Partners deviated from its market capitalization range stated in the guidelines. The guidelines state that: "The Manager uses a blend of smaller companies ranging in market capitalization for the portfolio from approximately \$100 million to \$2.5 billion at the initiation of the position." Artisan purchased one security (out of seventy-five holdings), which at the time of initial purchase had a market capitalization of \$2.7 billion.

²Kalmar Investments deviated from its market capitalization range stated in the guidelines. The guidelines state that: "The Manager uses a blend of smaller companies ranging in market capitalization for the portfolio from approximately \$100 million to \$2 billion at the initiation of the position." Kalmar purchased three securities (out of ninety-one holdings), which at the time of initial purchase had market capitalizations of up to \$2.40 billion

Domestic Equity 2

Domestic Equity Accounts 12/31/2007

Enhanced Investment Technologies (INTECH)	
Guideline	In Compliance
No single equity position > 5% of that company's total market cap	Yes
Weight of any holding shall not exceed benchmark holding by more than 2.5% at time of purchase	Yes ¹
All commercial paper obligations to have min. rtgs. of P-2 (Moody's) or A-2 (S&P's)	Yes
Weighted average market cap should not fall below \$10B	Yes
No derivatives, non-ADR foreign stocks without consent of Association	Yes

TCW Asset Management Company	
Guideline	In Compliance
No single equity position > 5% of that company's total market cap	Yes
≤ 10% per issue at market	Yes
All commercial paper obligations to have min. rtgs. of P-2 (Moody's) or A-2 (S&P's)	Yes
Minimum cap of each security must be \$3B at time of purchase. Free receives excluded.	Yes
No derivatives, non-ADR foreign stocks without consent of Association	Yes²

Wellington Capital Management	
Guideline	In Compliance
No single equity position > 5% of company's total market cap	Yes
≤ 7% per issue at market	Yes
All commercial paper obligations to have min. rtgs. of P-2 (Moody's) or A-2 (S&P's)	Yes
Weighted average market cap should not fall below \$5B	Yes
No derivatives, non-ADR foreign stocks without consent of Association	Yes

State Street Global Advisors	
Guideline	In Compliance
The investment policies of State Street shall be governed by the State Street's Fund Declaration.	Yes³

¹INTECH's guidelines were revised during 3Q07 to allow for holdings to be more than 2.5% after intial purchase as long as the postion is trimmed within 30 calendar days.

²Wellington's guidelines were revised during 3Q07 to allow for ADR's to be purchased in the over-the-counter markets as well.

³The Association's investment in State Street is made through a commingled vehicle. Therefore, the Association's investment guidelines do not govern the investment processes of the fund.

International Equity

International Equity Accounts 12/31/2007

Oechsle International	
Guideline	In Compliance
No single equity position > 5% of company's total market cap	Yes
≤ 5% per issue at market	Yes
All commercial paper obligations to have min. rtgs. of P-2 (Moody's) or A-2 (S&P's)	Yes
Weighted average market cap should not fall below \$1B	Yes
No derivatives without consent of Association	Yes

Franklin Templeton	
Guideline	In Compliance
No single equity position > 5% of company's total market cap	Yes
≤ 5% per issue at market	Yes
All commercial paper obligations to have min. rtgs. of P-2 (Moody's) or A-2 (S&P's)	Yes
Weighted average market cap should not fall below \$1B	Yes
No derivatives without consent of Association	Yes

Mondrian Investment Partners Limited	
Guideline	In Compliance
The investment policies of Mondrian shall be governed by the Mondrian Emerging Markets Equity Fund, L.P.'s Offering Memorandum.	Yes ¹

^{&#}x27;The Association's investment in Mondrian is made through a commingled vehicle. Therefore, the Association's investment guidelines do not govern the investment processes of the fund.

Domestic Fixed Income

Domestic Fixed Income Accounts 12/31/2007

BlackRock, Inc.	
Guideline	In Compliance
80% of portfolio to be comprised of investment grade (BBB or higher)	Yes
≤ 5% per issue at market except U.S. Govt. Bonds	Yes
Duration shall not exceed Lehman aggregate Bond Index by +/- 30%	Yes
All commercial paper obligations to have min. rtgs. of P-2 (Moody's) or A-2 (S&P's)	Yes
Use of derivatives to be disclosed quarterly to Association. No derivatives outside of benchmark duration	Yes
No use of stock options, margins, letter stocks, emer. mkt. securities, Z-Bonds, etc.	Yes

Loomis Sayles	
Guideline	In Compliance
80% of portfolio to be comprised of investment grade (BBB or higher) (inform Board)	Yes
≤ 5% per issue at market except U.S. Govt. Bonds	Yes
Duration shall not exceed Lehman aggregate Bond Index by more than 30%	Yes
All commercial paper obligations to have min. rtgs. of P-2 (Moody's) or A-2 (S&P's)	Yes
Use of derivatives to be disclosed quarterly to Association. No derivatives outside of benchmark duration	Yes
No use of stock options, margins, letter stocks, emer. mkt. securities, Z-Bonds, etc.	Yes

Bradford Marzec	
Guideline	In Compliance
80% of portfolio to be comprised of investment grade (BBB or higher)	Yes
≤ 5% per issue at market except U.S. Govt. Bonds	Yes
Duration shall not exceed Lehman aggregate Bond Index by more than 30%	Yes
All commercial paper obligations to have min. rtgs. of P-2 (Moody's) or A-2 (S&P's)	Yes
Use of derivatives to be disclosed quarterly to Association. No derivatives outside of benchmark duration	Yes
No use of stock options, margins, letter stocks, emer. mkt. securities, Z-Bonds, etc.	Yes

Domestic Fixed Income 2

Domestic Fixed Income Accounts 12/31/2007

Western Asset Management Company	
Guideline	In Compliance
80% of portfolio to be comprised of securities rated BBB- or higher	Yes
≤ 5% per issue at market except U.S. Govt. Bonds	Yes
Duration shall not exceed Lehman aggregate Bond Index by more than 30%	Yes
All commercial paper obligations to have min. rtgs. of P-2 (Moody's) or A-2 (S&P's)	Yes
No use of stock options, margins, letter stocks, emer. mkt. securities, Z-Bonds, etc.	Yes