

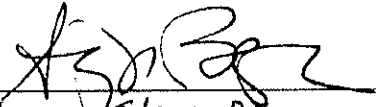
ODYSSEY INVESTMENT PARTNERS, LLC

December 29, 2011

ANNUAL CERTIFICATE OF COMPLIANCE

Reference is hereby made to the Public Pension Fund Reform Code of Conduct (the "Code"), to which Odyssey Investment Partners, LLC ("Odyssey") became a signatory on December 13, 2010. In accordance with Paragraph 27 of the Code, Odyssey hereby certifies to the Office of the New York Attorney General and each Public Pension Fund that owns an interest in an Odyssey fund that, to the best of its knowledge after due inquiry, Odyssey is in compliance with the Code with respect to all Public Pension Funds.

ODYSSEY INVESTMENT PARTNERS, LLC

By: 
Name: Steve Berger
Title: Managing Member