BOARD OF DIRECTORS (OPEN)

AGENDA ITEM 18c

ATTACHMENT 18c-I

RATIFICATION of INVESTMENT TRANSACTIONS (Compliance)

PRESENTED BY: Peter Guastamachio, Leslie Dawe

November 13, 2009

COMPLIANCE REPORT

As of September 30, 2009

The following is a list of securities currently not in compliance with State Fund's Investment Policy. State Fund's Investment Policy is reviewed annually by the Investment Committee and approved by the Board of Directors.

Description	Current	Maturity	Coupon	Book	Rating	Portfolio
	Face	Date	Rate	Yield		Manager
Long-term Investments						
						
Bonds Rated Below A *						
American Express Travel	10,000,000.00	11/21/11	5.250%	5.610%	A2/BBB+	GR-NEAM
American Express Co.	13,000,000.00	07/15/13	4.875%	4.600%	A3/BBB+	GR-NEAM
American Express Co.	47,725,000.00	09/12/16	5.500%	5.420%	A3/BBB+	Conning
California State	5,000,000.00	04/01/16	5.950%	5.090%	Baa1/A	GR-NEAM
California State	26,540,000.00	04/01/39	7.550%	7.220%	Baa1/A	GR-NEAM
Fifth Third Bancorp	34,000,000.00	06/01/18	4.500%	4.530%	Baa2/BBB-	GR-NEAM
Lehman Brothers Holdings	10,000,000.00	08/15/10	7.875%	0.000%	WR/D	Conning
Lehman Brothers Holdings	20,000,000.00	12/23/10	3.011%	0.000%	WR/D	GR-NEAM
Lehman Brothers Holdings	10,000,000.00	01/24/13	5.625%	0.000%	WR/NA	GR-NEAM
Lehman Brothers Holdings	45,000,000.00	03/13/14	4.800%	0.000%	WR/D	Conning
Lehman Brothers Holdings	10,000,000.00	09/26/14	6.200%	0.000%	WR/D	GR-NEAM
Mercantile Bankshares	22,620,000.00	04/15/13	4.625%	5.350%	Baa1/A-	Conning
Suntrust Bank	10,000,000.00	04/01/11	6.375%	4.160%	A3/BBB+	Conning
Suntrust Bank	11,000,000.00	09/11/17	6.000%	6.000%	Baa1/BBB+	GR-NEAM
Total: Bonds Rated Below A	274,885,000.00	14 item (s)				

^{*} In compliance at the time of purchase.

MOTION: To ratify compliance report.