
From: Lombardi_Michael
Sent: Thursday, May 03, 2007 4:42 PM
To: Sigrist_Kevin
Cc: Smith_Rob
Subject: Section 3(c)(7) of the Investment Company Act of 1940

Kevin,

This section requires all holders of the outstanding securities of an issuer be "qualified purchasers" (QP) as defined in Section 2(a)(51)(A) of the Investment Company Act. It permits the exclusion of investment companies from standard registration requirements with the SEC if all U.S. investors are "qualified purchasers." (While the LGIP is not considered a Qualified Institutional Buyer (QIB), it does meet the standard of a QP. This particular section is one of the policies used frequently by hedge fund companies to avoid certain SEC requirements.

Let me know if you need more information.

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