

# **Declarations of Class Representatives**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ANWAR, *et al.*,

Plaintiffs,

v.

FAIRFIELD GREENWICH LIMITED, *et al.*,

Defendants.

This Document Relates To: All Actions

Master File No. 09-cv-118 (VM)

**DECLARATION OF JEAN BERTIN AND BOB BOSMANS IN SUPPORT OF  
PLAINTIFFS' MOTION FOR CLASS CERTIFICATION**

We, Jean Bertin and Bob Bosmans, hereby state as follows:

1. A) I am the Head of Operations of AXA Private Management ("AXA"), a plaintiff in this action. As Head of Operations, I am authorized to execute this declaration on behalf of AXA.  
  
B) I am the Commercial Director of AXA Private Management ("AXA"), a plaintiff in this action. As Commercial Director, I am authorized to execute this declaration on behalf of AXA
2. We submit this declaration in support of Plaintiffs' Motion for Class Certification. This declaration is based on personal knowledge and/or an investigation of the relevant facts.
3. AXA made numerous investments in Fairfield Sigma ("the Fund") on behalf of its clients between July 1<sup>st</sup> 2005 and 1<sup>st</sup> October 2007


4. In deciding to make and hold these investments in the Fund, AXA reviewed and relied upon a variety of documents provided by Defendants.
5. In addition to reviewing these documents, AXA employees had a number of phone conversations or meetings with FGG representatives regarding investments in the Fund. AXA employees attended meetings with FGG representatives in Belgium and Brussels. In at least one of these meetings, the FGG representative present had the title Risk Manager. The information AXA was given during these meetings was substantially the same as the information contained in the offering documents.
6. AXA was also given access to the FGG website at [www.fggus.com](http://www.fggus.com) but did not keep specific records regarding the dates of visits to the website or content viewed.
7. Based on our review of the offering documents and our conversations with representatives of FGG, we made the decision to invest in the Fund.
8. While holding our investment in the Fund, we received monthly account statements from Citco, which reflected the value of our investment based on the Net Asset Value of each share. These statements reflected consistently positive gains. We relied upon each of these statements reflecting the value of our investment in the Fund both in deciding to retain the initial investment and in deciding to make additional investments in the Fund.
9. At all relevant times, we relied upon Defendants' representation that the Fund was going to invest, and actually was investing AXA's money in securities, that Defendants had verified the existence of these holdings, and that the various

financial statements reflecting the value of these holdings - and the Fund's value per share - were accurate.

10. In the course of making all of our investment decisions with respect to the Fund, AXA relied solely on information provided by Defendants. We had no access to or knowledge of information regarding the Fund beyond the information that Defendants provided to us.
11. We have actively monitored the progress of the case through regular contact with our attorneys. We have provided our attorneys with various documents related to our investment in the Fund, conferred with them regarding significant developments in the case, and worked closely with them in responding to Defendants' interrogatories.
12. If appointed Class Representative, AXA will use its best efforts to represent and protect the interests of all Class members who were injured by Defendants negligent and fraudulent conduct.

We declare under penalty of perjury that the foregoing is true and correct.

Executed on February 24<sup>th</sup> 2011

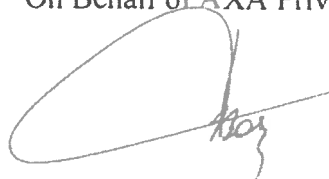


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Jean Bertin  
On Behalf of AXA Private Management

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Bob Bosmans  
On Behalf of AXA Private Management



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ANWAR, *et al.*,

Plaintiffs,

v.

FAIRFIELD GREENWICH LIMITED, *et al.*,

Defendants.

This Document Relates To: All Actions

Master File No. 09-cv-118 (VM)

**DECLARATION OF HANAN FRIEDMAN IN SUPPORT OF PLAINTIFFS'  
MOTION FOR CLASS CERTIFICATION**

I, Hanan Friedman, hereby state as follows:

1. I am the General Counsel for Harel Insurance Company Ltd. ("Harel"), a plaintiff in this action. As General Counsel, I am authorized to execute this declaration on behalf of Harel.
2. I submit this declaration in support of Plaintiffs' Motion for Class Certification. This declaration is based on my personal knowledge and/or an investigation of the relevant facts.
3. Harel invested assets in Fairfield Sentry as follows: \$3,000,000 in September 2003; \$4,000,000 on May 1, 2006; and \$4,700,000 on July 1, 2007.
4. In deciding to make and hold our investment in the Fund, Harel reviewed and relied upon a variety of documents regarding the investment, including a prospectus.
5. Based on our review of these various documents, we made the decision to invest



in the Fund.

6. In making our investments in the Fund, we received a certain number of shares in the Fund based on Citco's calculation of the Net Asset Value per share.
7. While holding our investment in the Fund, we received monthly account statements from Citco, which reflected the value of our investment based on the Net Asset Value of each share. These statements reflected consistently positive gains. We also occasionally reviewed the FGG website to monitor the Fund's performance and obtain other information about the Fund. We relied on this information both in deciding to retain the initial investment and in deciding to make additional investments in the Fund.
8. At all relevant times, we relied upon Defendants' representation that the Fund was going to invest, and actually was investing Harel's money in securities, that Defendants had verified the existence of these holdings, and that the various financial statements reflecting the value of these holdings - and the Fund's value per share - were accurate.
9. In the course of making all of our investment decisions with respect to the Fund, Harel had no access to or knowledge of information regarding the Fund beyond the information that Defendants provided either directly to Harel or to Harel's investment advisors. .
10. Harel has actively monitored the progress of the case through regular contact with our attorneys. We have provided our attorneys with various documents related to our investment in the Fund, conferred with them regarding significant developments in the case, and worked closely with them in responding to



Defendants' interrogatories.

11. If appointed Class Representative, Harel will use its best efforts to represent and protect the interests of all Class members who were injured by Defendants' negligent and fraudulent conduct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 24 2011

**Hanan Friedman, Adv.**

License No. 28016

**Legal Counsel**

~~Harel Insurance Investments Ltd.~~

Hanan Friedman

On Behalf of Harel Insurance Company Ltd.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ANWAR, *et al.*,

Plaintiffs,

v.

FAIRFIELD GREENWICH LIMITED, *et al.*,

Defendants.

This Document Relates To: All Actions

Master File No. 09-cv-118 (VM)

**DECLARATION OF ANTHONY MALLIS IN SUPPORT OF PLAINTIFFS'  
MOTION FOR CLASS CERTIFICATION**

I, Anthony Mallis, hereby state as follows:

1. I am the Chief Executive Officer of Securities & Investment Company Bahrain (“SICO Bahrain”) a plaintiff in this action. As CEO, I am authorized to execute this declaration on behalf of SICO Bahrain.
2. I submit this declaration in support of Plaintiffs’ Motion for Class Certification. This declaration is based on my personal knowledge and/or an investigation of the relevant facts.
3. SICO Bahrain invested assets in Fairfield Sentry as follows: \$1,000,000 on July 1, 2002; \$500,000 on April 1, 2004; \$1,500,000 on September 1, 2005; and \$815,000 on October 1, 2008.
4. In deciding to make and hold our investments in the Fund, SICO Bahrain reviewed and relied upon a variety of documents provided by Defendants, including a prospectus, and the annual Fairfield Sentry Directors’ Reports and



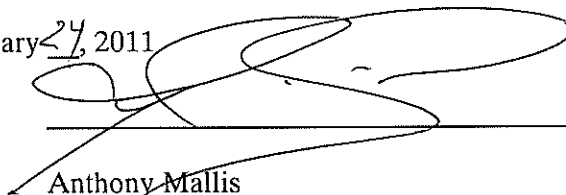
Financial Statements that contained the financial reports of the auditor, PricewaterhouseCoopers, from 2002-2007.

5. We also reviewed documents regarding the Fund posted on the Fairfield Greenwich Group website located at <https://www.fggus.com>.
6. In addition to reviewing these documents, I personally met with representatives of FGG, including Andres Piedrahita, in FGG's London Office prior to SICO Bahrain's initial investment. The subject matters discussed during this meeting included the Fund's historical performance, the structure of the Fund, the management of the Fund, services provided by Citco and audits provided by PwC. The information I was given in these conversations was substantially the same as the information contained in the offering documents and on the FGG website.
7. Based on our review of these various documents and my conversations with representatives of FGG, we made the decision to invest in the Fund.
8. In making our investments in the Fund, we received a certain number of shares in the Fund based on Citco's calculation of the net asset value per share.
9. While holding our investment in the Fund, we received monthly account statements from Citco, which reflected the value of our investment based on the Net Asset Value of each share. These statements reflected consistently positive gains. We also frequently reviewed the FGG website to track the Fund's performance and obtain updated NAV calculations. We relied upon each of these statements reflecting the value of our investment in the Fund both in deciding to retain the initial investment and in deciding to make additional investments in the Fund.

10. At all relevant times, we relied upon Defendants' representation that the Fund was going to invest, and actually was investing SICO Bahrain's money in securities, that Defendants had verified the existence of these holdings, and that the various financial statements reflecting the value of these holdings - and the Fund's value per share - were accurate.
11. In the course of making all of our investment decisions with respect to the Fund, SICO Bahrain relied solely on information provided by Defendants. We had no access to or knowledge of information regarding the Fund beyond the information that Defendants provided to us.
12. We have actively monitored the progress of the case through regular contact with our attorneys. We have provided our attorneys with various documents related to our investment in the Fund, conferred with them regarding significant developments in the case, and worked closely with them in responding to Defendants' interrogatories.
13. If appointed Class Representative, SICO Bahrain will use its best efforts to represent and protect the interests of all Class members who were injured by Defendants' negligent and fraudulent conduct.

I declare under penalty of perjury that the foregoing is true and correct.

- Executed on February 24, 2011



Anthony Mallis  
On Behalf of Securities & Investment  
Company Bahrain

**-UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ANWAR, *et al.*,

Plaintiffs,

v.

FAIRFIELD GREENWICH LIMITED, *et al.*,

Defendants.

This Document Relates To: All Actions

Master File No. 09-cv-118 (VM)

**DECLARATION OF MARTIN BACH IN SUPPORT OF PLAINTIFFS'  
MOTION FOR CLASS CERTIFICATION**

I, Martin Bach, declare as follows:

1. I am the Trustee of the Martin and Shirley Bach Family Trust (“Bach Trust”), a plaintiff in this action.
2. I submit this declaration in support of Plaintiffs’ Motion for Class Certification.  
This declaration is based on my personal knowledge.
3. The Bach Trust invested a total of \$1,375,000 in Greenwich Sentry (“the Fund”) on or around February 15, 2002; September 20, 2002; October 31, 2002; June 1, 2006; December 28, 2007; and August 25, 2008.
4. In deciding to make and hold investments in the Fund, I reviewed and relied upon a variety of documents provided by Defendants, including a prospectus for the Fund, documents reflecting the Fund’s historical performance (and NAVs), year-end reports on the Fund’s performance, documents concerning FGG’s due diligence practices, and certified audit reports from PricewaterhouseCoopers.

5. In addition to reviewing these documents, I discussed the performance and investment strategy of the Fund with an FGG partner, Jeffrey H. Tucker. The information Jeffrey H. Tucker provided in these conversations was substantially the same as the information contained in the offering and other documents.
6. Based on my review of these various documents and my conversations with FGG partner Jeffrey H. Tucker, it was my understanding that the Fund had historically delivered steady, positive returns and represented a low-risk investment.
7. In making our investments in the Fund, we became a limited partner in the Fund based on GlobeOp and Citco's calculation of the value of the partnership.
8. While holding its investments in the Fund, the Bach Trust received monthly account statements from GlobeOp and Citco, which reflected the value of our investment based on the value of the partnership. These statements reflected consistently positive gains. I relied upon each of these statements reflecting the value of the Bach Trust's investment in the Fund in deciding to retain the investment and to make subsequent investments.
9. At all relevant times, I relied upon Defendants' representation that the Fund was going to invest, and actually was investing, the Bach Trust's money in securities, that Defendants had verified the existence of these holdings, and that the various financial statements reflecting the value of these holdings—and the value of the partnership—were accurate.
10. In the course of making all of the Bach Trust's investment decisions with respect to the Fund, I relied solely on information provided by Defendants. I had no access to or knowledge of information regarding the Fund beyond the information

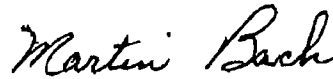
that Defendants provided to me.

11. I have actively monitored the progress of this case through regular contact with the Bach Trust's attorneys. I have provided them with various documents related to the Bach Trust's investment in the Fund, conferred with them regarding significant developments in the case, and worked closely with them in responding to Defendants' interrogatories.

12. If appointed Class Representative, the Bach Trust will use its best efforts to represent and protect the interests of all Class members who were injured by Defendants negligent and fraudulent misconduct.

I declare under penalty of perjury that the foregoing is true and correct.

• Executed on February 23, 2011



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Martin Bach  
On Behalf of the Martin and Shirley  
Bach Family Trust

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ANWAR, *et al.*,

Plaintiffs,

v.

FAIRFIELD GREENWICH LIMITED, *et al.*,

Defendants.

This Document Relates To: All Actions

Master File No. 09-cv-118 (VM)

**DECLARATION OF MICHAEL WIND IN SUPPORT OF PLAINTIFFS'  
MOTION FOR CLASS CERTIFICATION**

I, Michael Wind, declare as follows:

1. I am the Trustee of the Dawson Bypass Trust, a plaintiff in this action.
2. I submit this declaration in support of Plaintiffs' Motion for Class Certification.  
  
This declaration is based on my personal knowledge.
3. The Dawson Bypass Trust invested \$500,000 in Greenwich Sentry ("the Fund") on or about March 6, 2008.
4. In deciding to make and hold Dawson Bypass Trust's investment in the Fund, I reviewed and relied upon a variety of documents provided by Defendants, including a prospectus and marketing material for the Fund, which specified the Fund's performance and FGG's due diligence practices. I also received and considered the statements contained in PricewaterhouseCoopers's certified audit report.
5. In addition to reviewing these documents, I had conversations with an FGG

representative concerning the historical performance and investment strategy of the Fund. The information I was given in these conversations was substantially the same as the information contained in the offering documents.

6. Based on my review of these various documents and my conversations with FGG, it was my understanding that the Fund employed an investment strategy that presented very little downside risk and delivered steady, positive returns.
7. In making our investment in the Fund, we received a certain number of shares in the Fund based on Citco's calculation of the net asset value per share.
8. While holding our investment in the Fund, the Dawson Bypass Trust received monthly account statements from Citco, which reflected the value of our investment based on the Net Asset Value of each share. These statements reflected consistently positive gains. I relied upon each of these statements reflecting the value of the Dawson Bypass Trust's investment in the Fund in deciding to retain the investment.
9. At all relevant times, I relied upon Defendants' representation that the Fund was going to invest, and actually was investing The Dawson Bypass Trust's money in securities, that Defendants had verified the existence of these holdings, and that the various financial statements reflecting the value of these holdings—and the Fund's value per share—were accurate.
10. In the course of making all of our investment decisions with respect to the Fund, I relied solely on information provided by Defendants. I had no access to or knowledge of information regarding the Fund beyond the information that Defendants provided to me.

11. I have actively monitored the progress of this case through regular contact with the Dawson Bypass Trust's attorneys. I have provided them with various documents related to the Dawson Bypass Trust's investment in the Fund, conferred with them regarding significant developments in the case, and worked closely with them in responding to Defendants' interrogatories.

12. If appointed Class Representative, the Dawson Bypass Trust will use its best efforts to represent and protect the interests of all Class members who were injured by Defendants' negligent and fraudulent misconduct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 23, 2011

Michael Wind, Trustee

Michael Wind  
On Behalf of Dawson Bypass Trust



**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ANWAR, *et al.*,

Plaintiffs,

v.

FAIRFIELD GREENWICH LIMITED, *et al.*,

Defendants.

This Document Relates To: All Actions

Master File No. 09-cv-118 (VM)

**DECLARATION OF NATALIA HATGIS IN SUPPORT OF PLAINTIFFS'  
MOTION FOR CLASS CERTIFICATION**

I, Natalia Hatgis, declare as follows:

1. I am a plaintiff in this action.
2. I submit this declaration in support of Plaintiffs' Motion for Class Certification.
3. I invested \$600,000 in Greenwich Sentry ("the Fund" or "the Partnership") on or around December 2006.
4. In deciding to make and hold my investment in the Fund, my husband and I reviewed and relied upon a variety of documents provided by Defendants, including a prospectus. We also reviewed annual reports on the Fund's performance, and documents regarding FGG's extensive due diligence and depth of monitoring practices.
5. In addition to reviewing these documents, we had conversations with representatives of FGG concerning the historical performance of the Fund, FGG's method for selecting investment management companies, and FGG's due

diligence process before and after an investment was made. FGG represented that it was very diligent in selecting investment managers, and that it carefully monitored all selected managers. FGG further represented that it used Citco as an independent fund administrator who managed and verified the Fund's capital, and discussed its role and strong reputation. FGG assured us that it had a network of sources that provided constant and reliable feedback about investment managers and their investments. FGG represented that it had complete transparency to the invested assets. The information we were given in these conversations and subsequent to them was substantially the same as the information contained in the offering and other documents we reviewed.

6. Based on our review of these various documents and conversations with representatives of FGG, it was my understanding that the Fund employed a "split strike" investment strategy that presented a low risk investment with very low volatility and steady, constant yields.
7. In making my investment in the Fund, I became a limited partner in the Fund based on Citco's calculation of the value of the Partnership.
8. While holding my investment in the Fund, I received monthly account statements from Citco, which reflected the value of my investment based on the value of the Partnership. These statements reflected consistently positive gains. I relied upon each of these statements reflecting the value of my investment in the Fund in deciding to retain the investment.
9. At all relevant times, I relied upon Defendants' representation that the Fund was going to invest, and actually was investing my money in securities, that

Defendants had verified the existence of these holdings, and that the various financial statements reflecting the value of these holdings—and the value of the Partnership—were accurate.

10. In the course of making all of our investment decisions with respect to the Fund, I relied solely on information provided by Defendants. I had no access to or knowledge of information regarding the Fund beyond the information that Defendants provided to me.

11. I have actively monitored the progress of the case through regular contact with my attorneys. I have provided my attorneys with various documents related to my investment in the Fund, conferred with them regarding significant developments in the case, and worked closely with them in responding to Defendants' interrogatories.

12. If appointed Class Representative, I will use my best efforts to represent and protect the interests of all Class members who were injured by Defendants' negligent and fraudulent misconduct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 23<sup>rd</sup> 2011

  
Natalia Hatgis

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ANWAR, *et al.*,

Plaintiffs,

v.

FAIRFIELD GREENWICH LIMITED, *et al.*,

Defendants.

This Document Relates To: All Actions

Master File No. 09-cv-118 (VM)

**DECLARATION OF DUNCAN POLLOCK IN SUPPORT OF PLAINTIFFS'  
MOTION FOR CLASS CERTIFICATION**

I, Duncan Pollock, declare as follows:

1. I am the Chair of the Investment Committee of the St. Stephen's School Board of Trustees ("St. Stephen's"), a plaintiff in this action.
2. I submit this declaration in support of Plaintiffs' Motion for Class Certification.  
This declaration is based on my personal knowledge.
3. St. Stephen's invested \$1,122,060 in Fairfield Sigma ("the Fund") on December 1, 2005.
4. In deciding to make and hold our investment in the Fund, I reviewed and relied upon a variety of documents provided by Defendants, including a prospectus.
5. I also reviewed documents posted on the Fairfield Greenwich Group website located at <https://www.fggus.com>, including annual reports on the Fund's performance and documents concerning FGG's due diligence practices.
6. In addition to reviewing these documents, I had a number of conversations with

representatives of FGG concerning the historical performance of the Fund. The information I was given in these conversations was substantially the same as the information contained in the offering documents and on the FGG website.

7. Based on my review of these various documents and my conversations with representatives of FGG, it was my understanding that the Fund employed a "split strike" investment strategy that presented very little downside risk and delivered steady, positive returns.
8. In making our investment in the Fund, we received a certain number of shares in the Fund based on Citco's calculation of the Net Asset Value per share.
9. While holding our investment in the Fund, St. Stephen's received monthly account statements from Citco, which reflected the value of our investment based on the Net Asset Value of each share. These statements reflected consistently positive gains. St. Stephen's also received monthly statements via email from FGG indicating the performance of the Fund, and stressing the extraordinary due diligence undertaken by FGG to safeguard our investment. I relied upon each of these statements reflecting the value of St. Stephen's investment in the Fund in deciding to retain the investment.
10. At all relevant times, I relied upon Defendants' representation that the Fund was going to invest, and actually was investing St. Stephen's money in securities, that Defendants had verified the existence of these holdings, and that the various financial statements reflecting the value of these holdings - and the Fund's value per share - were accurate.
11. In the course of making all of our investment decisions with respect to the Fund, I

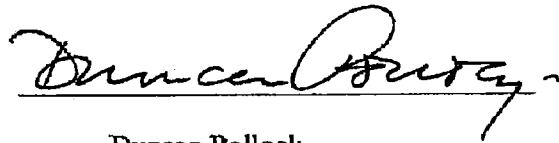
relied solely on information provided by Defendants. I had no access to or knowledge of information regarding the Fund beyond the information that Defendants provided to me.

12. I have actively monitored the progress of the case through regular contact with our attorneys. I have provided our attorneys with various documents related to our investment in the Fund, conferred with them regarding significant developments in the case, and worked closely with them in responding to Defendants' interrogatories.

13. If appointed Class Representative, St. Stephen's will use its best efforts to represent and protect the interests of all Class members who were injured by Defendants' negligent and fraudulent conduct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 23, 2011

A handwritten signature in cursive script, appearing to read "Duncan Pollock", written over a horizontal line.

Duncan Pollock  
On Behalf of St. Stephen's School  
Board of Trustees

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

PASHA S. ANWAR, *et al.*,

Plaintiffs,

v.

FAIRFIELD GREENWICH LIMITED, *et al.*,

Defendants.

This Documents Relates to: All Actions

**Master File No. 09-cv-00118(VM)**

**DECLARATION OF DR. LAURENCE WIENER IN SUPPORT  
OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION**

I, Dr. Laurence Wiener, declare as follows:

1. I am Trustee for the Pacific West Health Medical Center Employees Retirement Trust ("Pacific West"), a lead plaintiff and proposed class representative in this action. As Trustee, I am authorized to execute this declaration on behalf of Pacific West.

2. I submit this declaration in support of Plaintiffs' Motion for Class Certification.

3. Pacific West invested \$200,000 in Fairfield Sentry ("the Fund") on January 2, 2008.

4. In deciding to make our investment in the Fund, I reviewed and relied upon a variety of documents provided by Defendants, including a Private Placement Memorandum (the "PPM") for the Fund dated as of August 14, 2006. That PPM identified the auditor of the Fund as "Pricewaterhouse Coopers" (the Netherlands)

(“PWC”) and stated that “audited accounts as of the close of the last immediately fiscal year,” and “the auditor’s letter of consent” were available for review at “the Fund’s registered office in the British Virgin Islands.” Although I did not travel to the British Virgin Islands to review the earlier audited financial statements or the “auditor’s letter of consent,” I considered that PWC’s consent that its name be used in the PPM, and the clear representation that PWC had audited the Fund’s earlier financial statements, acted as a direct representation by PWC with respect to the historical financial information in the PPM – including that PWC had verified the existence of the assets that were the bases for calculating the Fund’s net asset value.

5. I was also given access, prior to my investment, by the Fairfield Greenwich Group (“FGG”) to its website located at <https://www.fggus.com>, I reviewed numerous documents on that website.

6. In addition to reviewing these documents, I had a number of conversations and email exchanges with representatives of FGG concerning the documents posted on the FGG website, the nature of the Fund’s investments, the Fund’s implementation of the split-strike conversion strategy, and the historical performance of the Fund.

7. In making our investment in the Fund, we received a certain number of shares in the Fund based on Citco’s calculation of the net asset value per share.

8. After Pacific West made the investment, the Citco Defendants, on April 15, 2008, provided me with a copy of the Fund’s audited financial statements for years ended 2007 and 2006, which included Pricewaterhouse Coopers LLP’s (Canada) opinion letter on the 2007 financial statements.

9. Based on my review of the various documents and my conversations and



correspondence with representatives of both FGG and Citco, I viewed the Fund as an attractive investment that would provide consistent, positive returns.

10. While holding our investment in the Fund, Pacific West received monthly account statements from Citco, which reflected the value of our investment based on the Net Asset Value of each share. These statements reflected consistently positive gains. I relied upon each of these statements reflecting the value of Pacific West's investment in the Fund in deciding to retain the investment.

11. At all relevant times, I relied upon Defendants' representation that the Fund was going to invest, and actually was investing Pacific West's money in securities, that Defendants had verified the existence of these holdings, and that the various financial statements reflecting the value of these holdings - and the Fund's net asset value per share - were accurate.

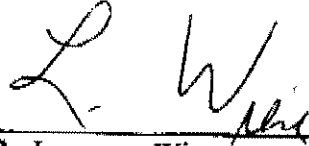
12. In the course of making all of our investment decisions with respect to the Fund, I relied solely on information provided by Defendants. I had no access to or knowledge of information regarding the Fund beyond the information that Defendants provided to me.

13. I have actively monitored the progress of the case through regular contact with our attorneys. I have provided our attorneys with various documents related to our investment in the Fund, conferred with them regarding significant developments in the case, and worked closely with them in responding to Defendants' interrogatories.

14. If appointed Class Representative, Pacific West will use its best efforts to represent and protect the interests of all Class members who were injured by Defendants' negligent and fraudulent conduct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 24, 2011



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Dr. Laurence Wiener  
On Behalf of Pacific West Medical Center  
Employees Retirement Trust