



THE RESOURCE CENTERS, LLC

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VILLAGE OF PALM SPRINGS GENERAL EMPLOYEES' PENSION FUND

Meeting of Tuesday, May 5, 2020

Location: **Electronic Meeting**

Meeting Contact: (800) 206-0116 (Plan Administrator)

Time: 2:00 P.M.

INSTRUCTIONS TO JOIN MEETING ELECTRONICALLY

Meeting ID: **149 345 1108**

Resource Centers is inviting you to a scheduled RingCentral meeting:

For Video & Audio (Recommended):

If you are using a mobile device (Smart Phone or Tablet) use the "RingCentral" App.

Link to Join from Laptop, PC, Mac, Linux, iOS or Android:

<https://meetings.ringcentral.com/j/1493451108>

For Voice Only:

US: 1(470)8692200: USE CODE 1493451108#

PLEASE NOTE:

Should any interested party seek to appeal any decision made by the Board with respect to any matter considered at such meeting or hearing, he will need a record of the proceedings, and for such purpose he may need to insure that a verbatim record of the proceedings is made, which record includes the testimony and evidence upon which the appeal is to be based. In accordance with the Americans With Disabilities Act of 1990, persons needing a special accommodation to participate in this meeting should contact The Resource Centers, LLC no later than four days prior to the meeting.

THE RESOURCE CENTERS LLC



RingCentral Meetings™ QuickStart Guide

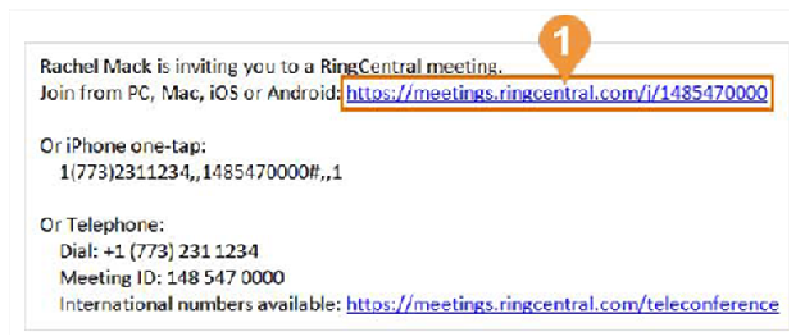
Install from a Meeting Invitation

When participating in a RingCentral meeting for the first time, you may not be able to join right away after the link from the email invitation has been clicked. This happens when the RingCentral Meetings app has not been installed on the computer or mobile phone yet.

Please Note: If you have a device assigned by a local government or other company, and that agency does not allow individual end users to install applications downloaded from the Internet, then you may need assistance from your IT administrator to download RingCentral Meetings for the first time. Contact your IT administrator prior to the start of the initial RingCentral meeting if this is the case.

Installation Using a Laptop (Recommended): **FOLLOW THE PROMPTS**

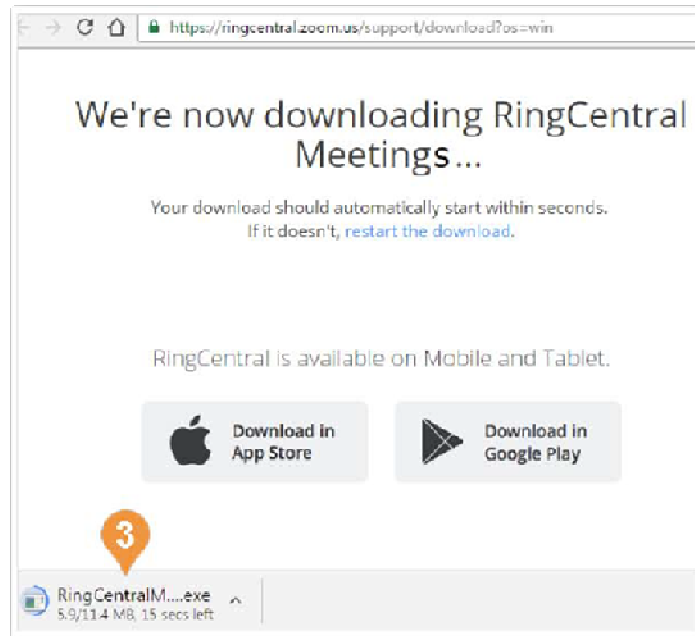
1. Click the meeting link in the body of the calendar or email invite.



2. You will be redirected to meetings.ringcentral.com in your web browser and the application downloads automatically. Click the blue link if the application does not automatically download.



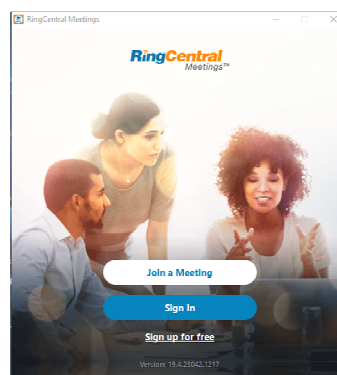
- Once the download is completed, click on the box in the lower left-hand corner of your browser to start the installation.



- Click Run to complete the installation of the RingCentral Meetings app.



- Once the download is complete, Open the application and you can join the meeting.



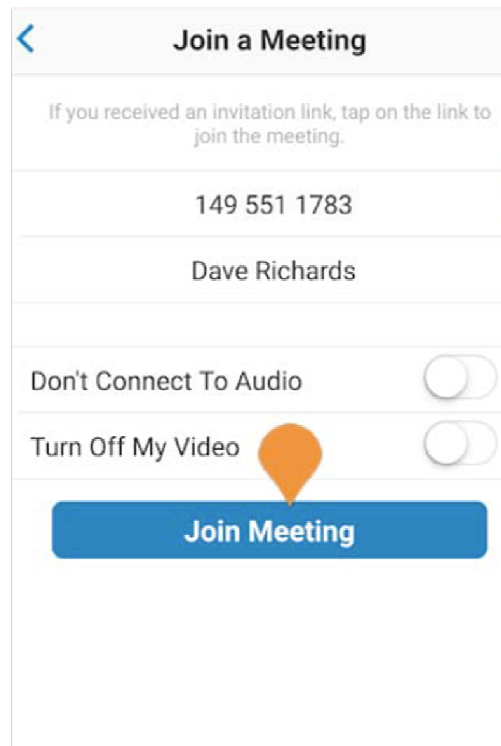
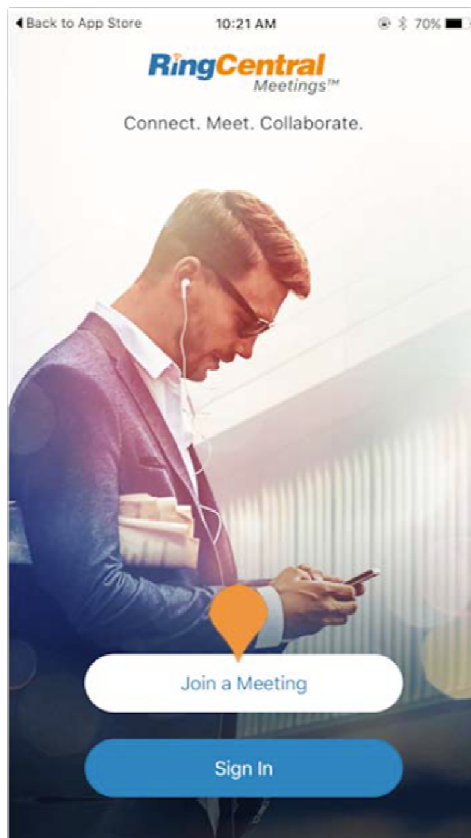
Installation on a Smartphone or Tablet:

Download and install RingCentral Meetings from the iTunes® App Store or Google Play.

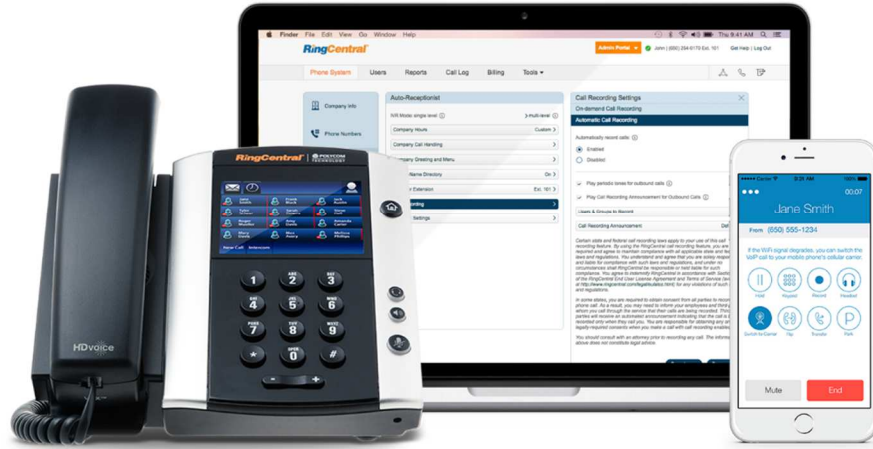


Allow the App to access your device video and audio.

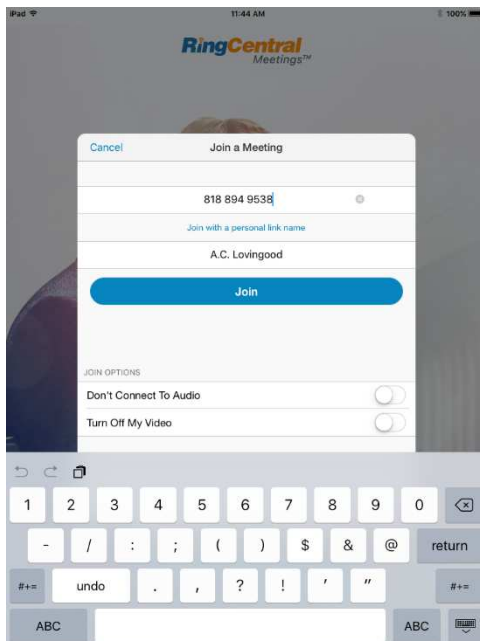
Once the application is installed you can tap Join a Meeting. Enter the Meeting ID and Your Name. Then tap Join.



RingCentral Meeting Quick Tips and Pointers



From your phone, the Meeting will feel and sound exactly like a normal conference call.



Allow RingCentral to connect to your device audio and video on installation. If asked, give permissions to allow RingCentral to access your device; do not turn off audio and video. This will save you much grief later.

We like laptop and tablet devices the best. Your audio and video controls are down here, at the lower left.



On your mobile device, tap your screen if you do not see your screen controls. Again, your audio and video controls are down here.



You can swipe right or swipe left to see additional participants in the meeting, and you can also access settings.

**VILLAGE OF PALM SPRINGS GENERAL EMPLOYEES’
PENSION FUND**

Meeting of Tuesday, May 5, 2020

AGENDA

1. Call Meeting to Order
2. Approval of Administrative Policy
 - a. Administrative Policy Governing the Use of Audio-Video or Telephone Conferencing to Conduct Virtual Public Board of Trustee Meetings
3. Minutes of Meeting Held February 4, 2020
4. Actuary Report: Chad Little
5. Investment Manager Report: Principal (Gregory Pittenger and Bridget Lechtenberg)
6. Investment Monitor Report: Jennifer Gainfort
 - a. Quarterly Performance Report
 - b. Anchor Capital Fee Structure Letter dated March 9, 2020
 - c. GTAA Manager Search
7. Attorney Report: Bonni Jensen
 - a. Status of Proposed Amendment to 5th Trustee Qualifications
 - b. Memorandum Regarding Form 1 Filing dated April 2020
 - c. Memorandums Regarding the CARES Act and FFCRA
 - d. Discussion of Benefit Forfeiture – William F. Davis, Jr.
8. Administrative Report: Margie Adcock
 - a. Disbursements
9. Other Business
10. Public Comments

Email Public Comments During the Meeting to: palmspringsgeneral@resourcecenters.com
11. Schedule Next Meeting: Tuesday, August 4, 2020 at 2:00 P.M.
12. Adjourn

Village of Palm Springs General Employees' Pension Fund

Administrative Policy Governing the Use of Audio-Video or Telephone Conferencing to Conduct Virtual Public Board of Trustee Meetings

BACKGROUND

Florida Statute, §286.011 governs Florida's Sunshine law. Pursuant to this section, "[a]ll meetings of any board or commission of any state agency or authority or of any agency or authority of any county, municipal corporation, or political subdivision . . . at which official acts are to be taken are declared to be public meetings open to the public at all times, and no resolution, rule, or formal action shall be considered binding except as taken or made at such meeting. . . .";

On March 1, 2020, the State Surgeon General and State Health Officer declared a Public Health Emergency exists in the State of Florida as a result of COVID-19;

On March 9, 2020, by Executive Order 20-52, the Governor of Florida declared a state of emergency for the entire State of Florida as a result of COVID-19;

On March 16, 2020, the President of the United States and the Centers for Disease Control and Prevention recommended individuals to practice significant social distancing measures including but not limited to working from home and avoiding gatherings of more than 10 people.

AUTHORITY

On March 20, 2020, the Governor of Florida issued Executive Order 20-69 suspending any Florida Statute requiring a physical quorum be present for a local government body to meet at a specific public place. Pursuant to Executive Order 20-69, government bodies may utilize audioconferencing and or teleconferencing to conduct its public meeting. This Executive Order expires May 8, 2020, unless extended by the Governor.

The Village of Palm Springs General Employees' Pension Fund document, Section 6 Plan Administrator, provides: "The Plan Administrator of the Village of Palm Springs General Employee's Pension Plan shall be the Board of Trustees of this Pension Plan." The Board of Trustees (the "Board") is also authorized to adopt administrative policies necessary for the proper operation of the Plan. Section 12(b)(4) provides, in pertinent part:

Sec. 12. – Powers and Duties of Trustees.

- (b) The duties and responsibilities of the Board of Trustees shall include, but not necessarily be limited to, the following:

- (4) To establish uniform rules and procedures to be followed for administrative purposes, benefit applications and all matters required to administer the Pension Fund.

ADMINISTRATIVE POLICY

1. Effective March 20, 2020, this Board may conduct its meetings and meet the quorum requirements via audio-video conferencing and or teleconferencing.
2. Public participation is of the utmost importance; therefore, the Board may choose to use either audio-video conferencing or teleconferencing communication to conduct virtual meetings.
3. The Board retains the right to maintain decorum to orderly conduct Board meeting.
4. If the Board chooses to use audio-video conferencing it will use a software which allows for maximum public participation. For example, those platforms may include: (a) Zoom; (b) GoTo Meeting; (c) Microsoft Teams, which provides a feature for ADA compliance and close captioning; or (d) WebX.
5. The meeting notice will provide an e-mail address where the public can submit questions and or comments. Any such comments or questions will be read aloud during the public comment section of the meeting agenda.
6. In the event the Board chooses to use teleconferencing communication, it will take such steps as are necessary to effectuate public access, including any applicable email and telephone access point.
7. In the event the local government requires meetings to be live streamed, the Board will comply with those requirements through the Village system.
8. The meeting notice will state that any individuals needing ADA accommodations to attend a virtual meeting should contact the Plan Administrator, Margie Adcock, at least 7 days prior to the meeting at 561-624-3277. The notice shall also identify the specific type of audio-video conferencing to be used and include instructions on how to join and participate virtually.

Village of Palm Springs General Employees' Pension Fund
Administrative Policy Governing the Use of Audio-Video or Telephone Conferencing to
Conduct Public Board of Trustee Meetings
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9. In addition, the meeting notice must also contain information regarding the means to access the agenda and the meeting material.
10. In the event the available technology is insufficient to permit all interested parties to attend and participate, the virtual meeting must be terminated until such time as the problem has been resolved. There is no obligation for the Board to provide communication devices for public use.
11. All other Sunshine law provisions must be followed including: (a) posting of meeting notice, (b) taking of meeting minutes, and (c) making minutes available for public inspection.
12. This Administrative Policy will remain in effect until May 8, 2020, unless Executive Order 20-52 is extended by the Governor of Florida, in which case, the Policy is also extended.

The Board reserves the right to amend this Administrative Policy from time to time as it deems appropriate. The Board shall retain the right to exercise its discretion in interpreting this rule and in resolving any disputes that may arise hereunder. Nothing in this Administrative Policy creates a contractual or substantive right for benefits from the Plan.

This Administrative Policy was adopted by the Board of Trustees at a public meeting, on _____, 2020.

Chair

Secretary

Investment Performance Review
Period Ending March 31, 2020

Village of Palm Springs General Employees' Pension Plan



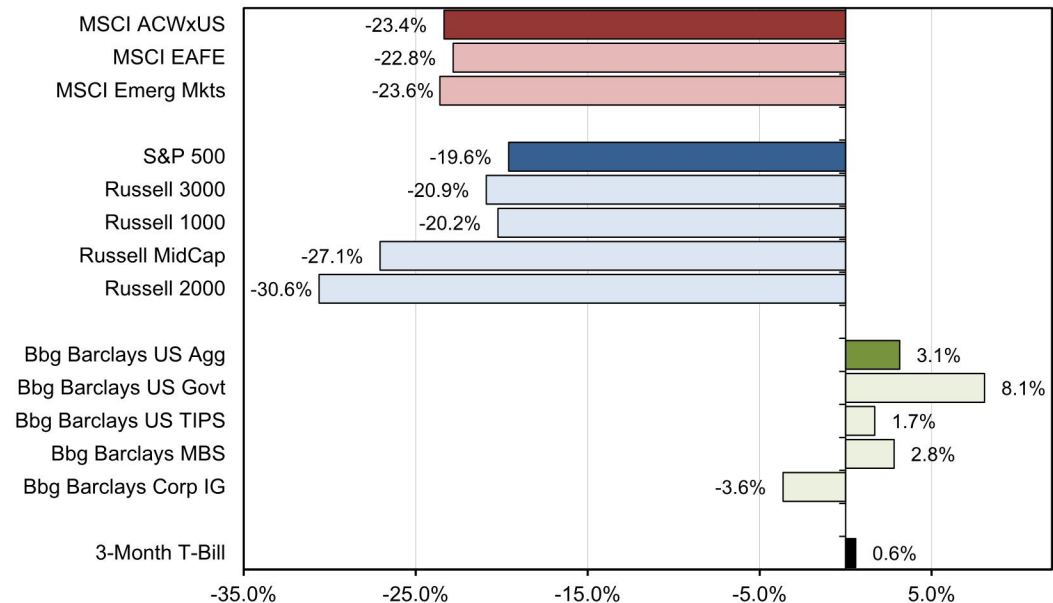
1st Quarter 2020 Market Environment



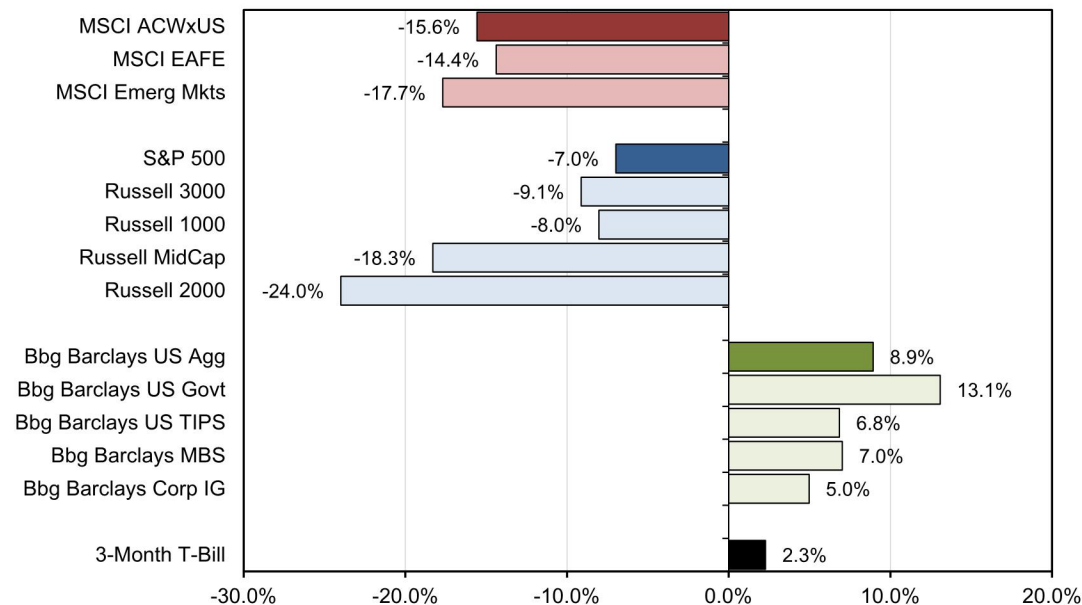
- Global risk asset class returns declined significantly during the 1st quarter of 2020 due primarily to the COVID-19 (Coronavirus) pandemic. Both domestic and international equities experienced significant drawdowns as investors moved into perceived haven assets such as US Treasury bonds. Equity market volatility, as measured by the VIX Index, reached its highest level since the Financial Crisis in 2008. Through the quarter, global economic growth turned negative as countries responded to the pandemic by shuttering their economies. In the US, as a result of the decision to institute social distancing and shelter-in-place orders, labor markets suffered significant losses as businesses closed or furloughed employees. Rising economic concerns resulted in swift action by the Federal Reserve (Fed) which cut its overnight lending rate to between 0% to 0.25%. Importantly, the US government responded with a stimulus package consisting of forgivable loans and other short-term benefits, that is designed to act as a bridge for the economy until businesses can reopen. Within domestic equity markets, large cap stocks outperformed small cap equities during the quarter with the S&P 500 Index returning -19.6% versus a -30.6% return for the small cap Russell 2000 Index. US equity returns over the 1-year period turned negative as a result of the drawdown with large and mid-cap stocks returning -7.0% and -18.3% respectively, while small cap stocks fell -24.0%.
- International markets also posted negative returns for the 1st quarter. Similar to US markets, international returns were impacted by the Coronavirus and deteriorating economic fundamentals. International returns also faced headwinds from a strengthening US dollar (USD) which appreciated against most major currencies during the period. Developed markets outpaced emerging markets during the period with the MSCI EAFE Index falling -22.8% versus a -23.6% decline for the MSCI Emerging Markets Index. Both developing and emerging markets posted losses over the 1-year period, returning -14.4% and -17.7% respectively.
- As expected during periods of rising volatility, high quality fixed income outperformed equities during the 1st quarter as investors looked for relative safety amid the equity market drawdown. The broad market Bloomberg Barclays Aggregate Index gained 3.1% as interest rates fell following rising concerns related to the Coronavirus and central bank stimulus from the Fed and other global central banks. US Government bonds were the best performing securities for the 1st quarter returning 8.1%. Investment grade corporate bonds suffered negative returns on concerns about economic growth prospects in the future. The bond market has meaningfully outperformed the equity market over the trailing 1-year period with the Bloomberg Barclays Aggregate posting a solid 8.9% return.

Source: Investment Metrics

Quarter Performance

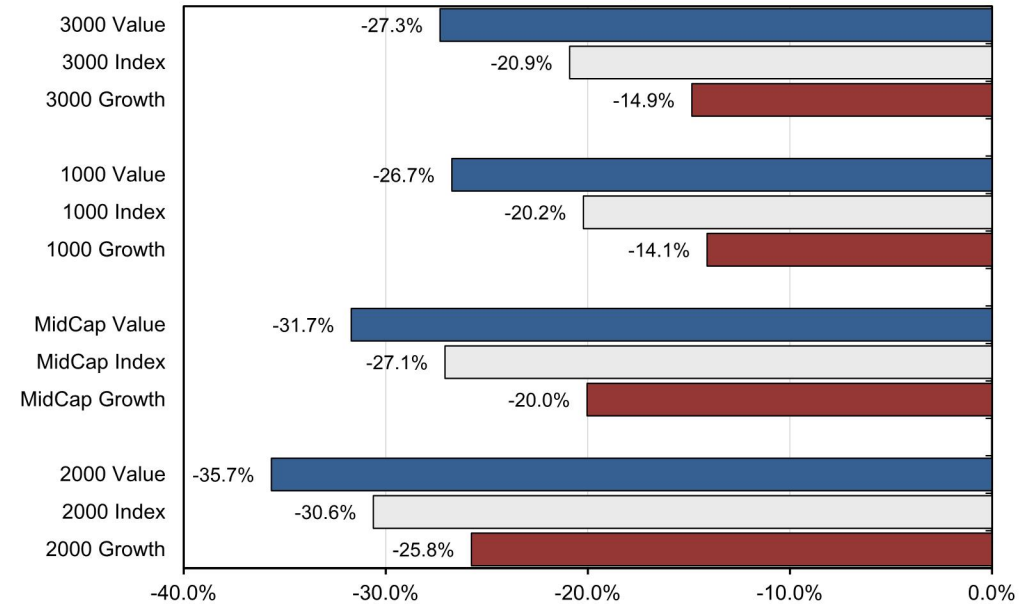


1-Year Performance

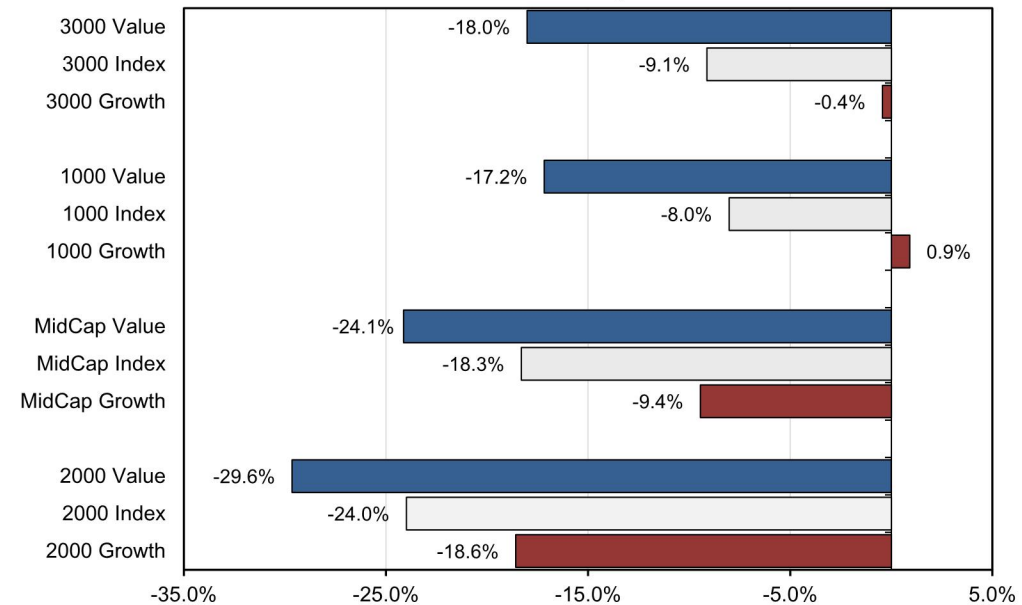


- US equity returns were significantly lower during the 1st quarter with varied results across both style and market capitalization. Concerns related to the Coronavirus, in combination with signs that the US economy could be entering into recession weighed on equities. Labor markets came under significant pressure during the quarter as companies began laying off employees in response to the government's decision to mandate a shelter-in-place approach to dealing with the pandemic. In response to the deteriorating economic conditions, the Fed took unprecedented action on March 15th and lowered the Fed Fund's rate to between 0% to 0.25%. The Fed also announced that it would be purchasing up to \$500 billion in US Treasury bonds and \$200 billion in mortgage-backed bonds. Subsequently, the Fed announced on March 23rd that it would begin purchasing unlimited amounts of US Treasury and mortgage-backed bonds. This announcement was well received by investors and marked the recent low in equity markets.
- During the quarter, higher market capitalization stocks were down less than lower market capitalization stocks across the style spectrum. The large cap Russell 1000 Index lost -20.2% during the period versus a -30.6% return for the small cap Russell 2000 Index. Investors preferred large cap stocks relative to small cap stocks as they are typically viewed as less risky during periods of rising market volatility given the size of their balance sheets and ability to generate cash flow. When viewed over the most recent 1-year period, large cap stocks significantly outpaced small cap stocks with the Russell 1000 posting a -8.0% loss compared to the -24.0% drawdown in the Russell 2000.
- In general, value stocks underperformed growth stocks across market capitalizations during the 1st quarter despite value stocks trading near all-time lows based on valuation metrics. Importantly, value indexes contain large exposures to such sectors as energy, consumer durables and financials, all of which came under pressure during the quarter. Large cap growth stocks held up better than large cap value stocks due to larger weightings in the technology and industrials sectors as well as a smaller exposure to the underperforming energy sector. The Russell 1000 Growth Index was the least negative style index for the period, returning -14.1%. The small cap value index posted the weakest relative return for the quarter with a loss of -35.7%. Results over the 1-year period were mixed with value stocks underperforming across market capitalizations while large cap stocks outpaced both mid and small cap stocks due in large part to the exposure to technology stocks and relative underweights to both energy and financial stocks.

Quarter Performance - Russell Style Series



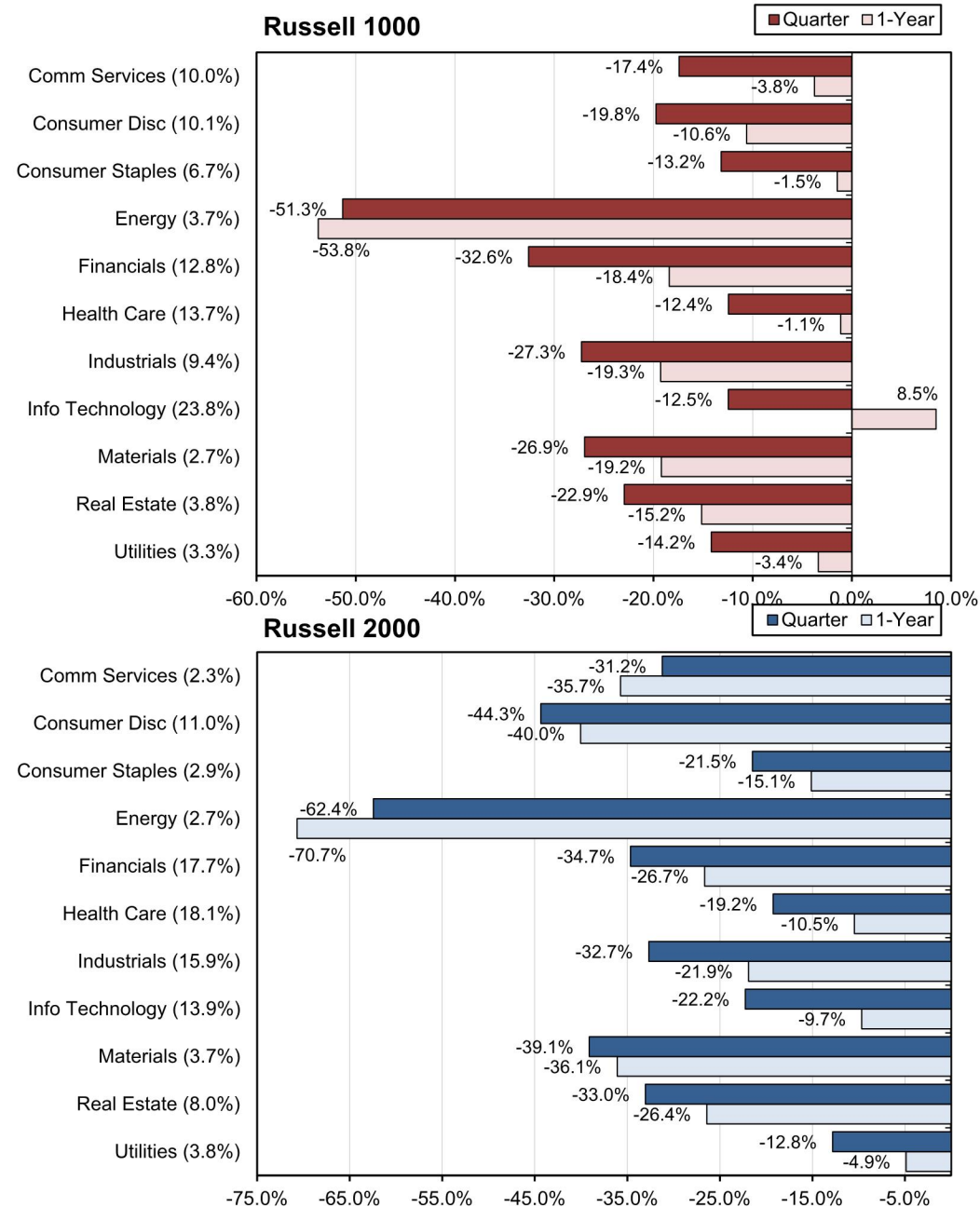
1-Year Performance - Russell Style Series



Source: Investment Metrics



- Generally, sector performance was negative across large cap sectors for the 1st quarter. The outlier during the period was the energy sector which saw significant losses due primarily to the drop in oil prices as a result of demand destruction related to the Coronavirus and the inability of OPEC to agree on production cuts. Health care and technology were the two of the least negative during the quarter returning -12.4% and -12.5%. Energy stocks fell a staggering -51.3% during the quarter as crude oil prices fell as global economic growth receded during the period. Financial stocks also lagged, declining -32.6%, as interest rates fell and a flat yield curve, in combination with fewer borrowers, increased pressure on financial stocks. Returns over the 1-year period were also generally negative with only the technology sector showing a positive return (+8.5%). Similar to the quarter's results, energy stocks underperformed by a considerable margin relative to other sectors. Industrials, materials, and financials also lagged for the year returning -19.3%, -19.2% and -18.4% respectively.
- Quarterly results for small capitalization sectors were generally worse than their large capitalization counterparts with only utilities outperforming during the period. All eleven economic sectors saw substantial losses during the period with only three of eleven sectors outpacing the Russell 2000 Index return for the quarter. Similar to large capitalization sectors, defensive sectors were less negative as investors gravitated toward their relative safety and higher yields. Utilities was the least negative sector, returning -12.8%, while healthcare and consumer staples returned -19.2% and -21.5%, respectively. The cyclically oriented energy sector was the largest detractor for the period, posting a disconcerting loss of -62.4% as global energy prices collapsed. Consumer discretionary stocks also fell substantially during the quarter returning -44.3% as consumer activity fell sharply following the decision to impose shelter-in-place orders. Financial stocks, which were down -34.7% for the quarter, were negatively impacted by the Fed's decision to lower interest rates and the significant decline in lending activity. Similar to quarterly performance, the trailing 1-year period returns were broadly negative. Utilities, technology and health care sectors were the down the least, returning -4.9%, -9.7% and -10.5%, respectively.



Source: Morningstar Direct

As a result of the GICS classification changes on 9/28/2018 and certain associated reporting limitations, sector performance represents backward looking performance for the prior year of each sector's current constituency, post creation of the Communication Services sector.



The Market Environment
Top 10 Index Weights & Quarterly Performance for the Russell 1000 & 2000
As of March 31, 2020

Top 10 Weighted Stocks				
Russell 1000	Weight	1-Qtr Return	1-Year Return	Sector
Microsoft Corp	5.09%	0.3%	35.5%	Information Technology
Apple Inc	4.47%	-13.2%	35.6%	Information Technology
Amazon.com Inc	3.48%	5.5%	9.5%	Consumer Discretionary
Facebook Inc A	1.70%	-18.7%	0.1%	Communication Services
Berkshire Hathaway Inc B	1.53%	-19.3%	-9.0%	Financials
Alphabet Inc Class C	1.49%	-13.0%	-0.9%	Communication Services
Johnson & Johnson	1.49%	-9.5%	-3.6%	Health Care
Alphabet Inc A	1.48%	-13.2%	-1.3%	Communication Services
JPMorgan Chase & Co	1.20%	-35.0%	-8.4%	Financials
Visa Inc Class A	1.18%	-14.1%	3.8%	Information Technology

Top 10 Performing Stocks (by Quarter)				
Russell 1000	Weight	1-Qtr Return	1-Year Return	Sector
Moderna Inc	0.03%	53.1%	47.2%	Health Care
Legg Mason Inc	0.02%	37.2%	86.1%	Financials
Taubman Centers Inc	0.01%	36.6%	-15.3%	Real Estate
Virtu Financial Inc A	0.00%	31.9%	-7.8%	Financials
Zscaler Inc	0.02%	30.9%	-14.2%	Information Technology
Regeneron Pharmaceuticals Inc	0.17%	30.0%	18.9%	Health Care
Citrix Systems Inc	0.07%	28.0%	44.0%	Information Technology
RingCentral Inc Class A	0.07%	25.6%	96.6%	Information Technology
NortonLifeLock Inc	0.04%	25.4%	40.9%	Information Technology
Tesla Inc	0.32%	25.3%	87.2%	Consumer Discretionary

Bottom 10 Performing Stocks (by Quarter)				
Russell 1000	Weight	1-Qtr Return	1-Year Return	Sector
Centennial Resource Dev. Inc A	0.00%	-94.3%	-97.0%	Energy
Kosmos Energy Ltd	0.00%	-84.0%	-85.0%	Energy
Apache Corp	0.01%	-83.5%	-87.5%	Energy
Transocean Ltd	0.00%	-83.1%	-86.7%	Energy
Apergy Corp	0.00%	-83.0%	-86.0%	Energy
Targa Resources Corp	0.01%	-82.7%	-81.7%	Energy
Norwegian Cruise Line Holdings Ltd	0.01%	-81.2%	-80.1%	Consumer Discretionary
MFA Financial Inc	0.00%	-79.7%	-76.9%	Financials
Chesapeake Energy Corp	0.00%	-79.1%	-94.4%	Energy
Macerich Co	0.00%	-78.4%	-85.6%	Real Estate

Top 10 Weighted Stocks				
Russell 2000	Weight	1-Qtr Return	1-Year Return	Sector
Teladoc Health Inc	0.77%	85.2%	178.8%	Health Care
NovoCure Ltd	0.40%	-20.1%	39.8%	Health Care
Amedisys Inc	0.40%	10.0%	48.9%	Health Care
Generac Holdings Inc	0.39%	-7.4%	81.9%	Industrials
Lumentum Holdings Inc	0.38%	-7.1%	30.4%	Information Technology
Repligen Corp	0.35%	4.4%	63.4%	Health Care
Haemonetics Corp	0.35%	-13.3%	13.9%	Health Care
ACADIA Pharmaceuticals Inc	0.33%	-1.2%	57.4%	Health Care
Trex Co Inc	0.32%	-10.8%	30.3%	Industrials
Rexford Industrial Realty Inc	0.32%	-9.7%	16.6%	Real Estate

Top 10 Performing Stocks (by Quarter)				
Russell 2000	Weight	1-Qtr Return	1-Year Return	Sector
Waitr Holdings Inc Class A	0.00%	282.0%	-90.0%	Consumer Discretionary
Novavax Inc	0.03%	241.2%	23.3%	Health Care
Vir Biotechnology Inc	0.02%	172.5%	N/A	Health Care
Athersys Inc	0.03%	143.9%	100.0%	Health Care
Forty Seven Inc	0.17%	142.4%	490.5%	Health Care
Kala Pharmaceuticals Inc	0.01%	138.2%	6.3%	Health Care
Aduro Biotech Inc	0.01%	132.2%	-31.2%	Health Care
Tocagen Inc	0.00%	128.8%	-88.8%	Health Care
Inovio Pharmaceuticals Inc	0.05%	125.5%	99.5%	Health Care
Neon Therapeutics Inc	0.00%	123.7%	-59.1%	Health Care

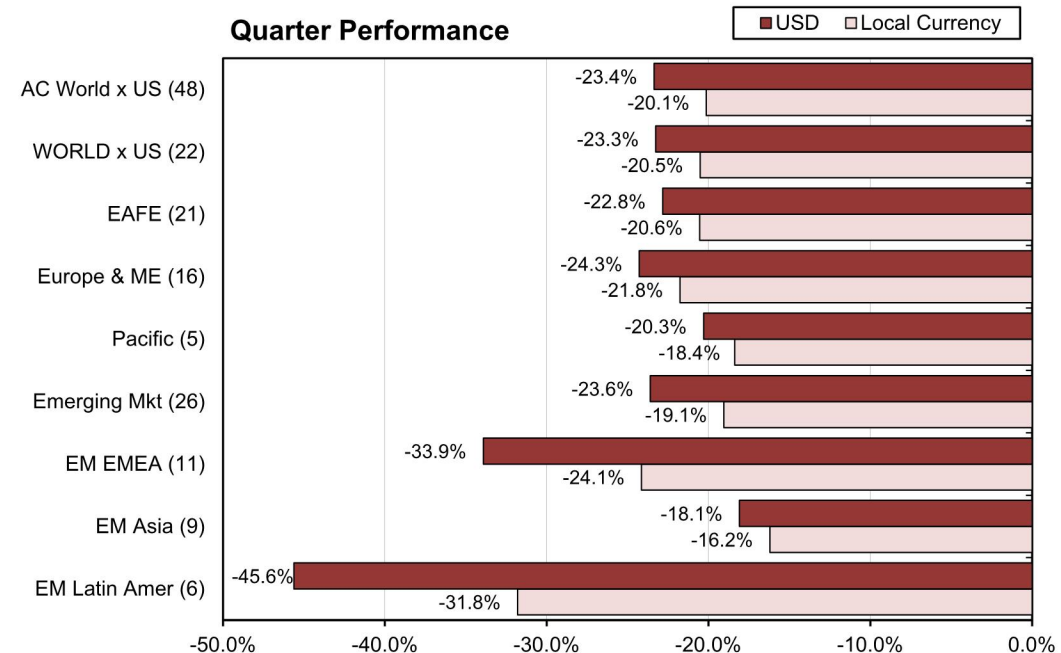
Bottom 10 Performing Stocks (by Quarter)				
Russell 2000	Weight	1-Qtr Return	1-Year Return	Sector
Independence Contract Drilling Inc	0.00%	-93.0%	-97.5%	Energy
QEP Resources Inc	0.01%	-92.5%	-95.6%	Energy
Whiting Petroleum Corp	0.00%	-90.9%	-97.4%	Energy
Amplify Energy Corp	0.00%	-90.4%	-93.0%	Energy
Penn Virginia Corp	0.00%	-89.8%	-93.0%	Energy
Pacific Drilling SA	0.00%	-89.8%	-97.1%	Energy
Nine Energy Service Inc	0.00%	-89.7%	-96.4%	Energy
Forum Energy Technologies Inc	0.00%	-89.4%	-96.5%	Energy
Oasis Petroleum Inc	0.01%	-89.3%	-94.2%	Energy
SM Energy Co	0.01%	-89.1%	-93.0%	Energy

Source: Morningstar Direct

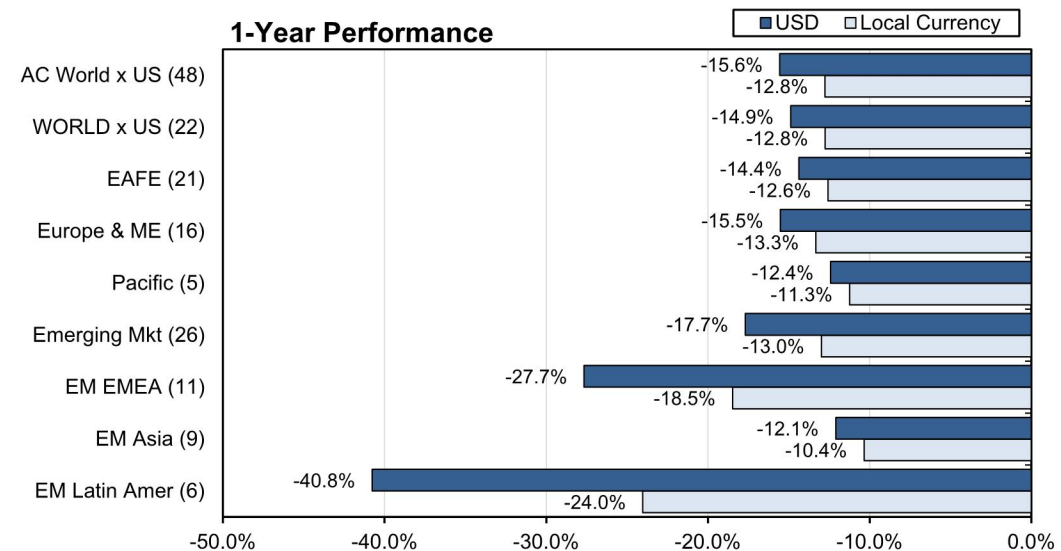


- International equity returns were negative in USD terms for the 1st quarter as markets were negatively impacted by the Coronavirus. In local currency terms, developed and emerging markets performed slightly better due to US dollar (USD) strength against most major currencies which created a significant headwind for US investors. The MSCI ACWI ex US Index lost -20.1% in local currency terms while a USD investor experienced a loss of -23.4% due to the aforementioned currency effect. Similar to US markets, international equity markets were severely impacted by concerns regarding headwinds from slowing economic data. Global central banks reacted by providing additional stimulus measures which are designed to provide the market with liquidity and restore confidence. The European Central Bank (ECB) and the Japanese Central Bank (JCB) announced new programs to purchase securities in an effort to boost markets while the Bank of England (BOE) cut its policy rate to 0.1% and announced additional quantitative easing in an effort to counteract a deterioration in the economy.
- Results for developed market international indices were negative in both local currency terms and USD terms for the 1st quarter. Prior to the onset of the Coronavirus, there were notable developments within the political sphere. The UK formally withdrew from the EU in January. While there remains much uncertainty surrounding what the relationship between the UK and the EU will look like, both sides are continuing to negotiate for a final withdrawal later this year. In Europe, Italy and Spain were hard hit by the Coronavirus. Already beset by relatively low GDP growth in historical terms, the region is expected to experience recession. In Japan, the economy was already under pressure as a result of declining trade with China prior to the onset of the Coronavirus. The Olympics were also rescheduled to 2021 in an effort to reduce the number of potential infections.
- Emerging markets continued their trend from 2019, underperforming relative to developed markets during the 1st quarter. The MSCI Emerging Markets Index fell -23.6% and -19.1% in USD and local currency terms, respectively. The US and China made headway in resolving their trade war by signing the Phase One trade deal in January. Countries with greater sensitivities to commodity prices or a strong USD tended to underperform during the period. Regionally, Asian countries outperformed both EMEA and Latin America, primarily due to their aggressive response to the Coronavirus. Within Latin America, Brazil and Mexico were hard hit as a result of the selloff in oil prices. Argentina underperformed as the country considered delaying the payment of interest on its sovereign debt.

Quarter Performance



1-Year Performance



Source: MSCI Global Index Monitor (Returns are Net)



The Market Environment
US Dollar International Index Attribution & Country Detail
As of March 31, 2020

MSCI - EAFE	Sector Weight	Quarter Return	1-Year Return
Communication Services	5.5%	-18.0%	-11.5%
Consumer Discretionary	11.1%	-26.8%	-15.0%
Consumer Staples	12.6%	-13.5%	-8.5%
Energy	4.0%	-36.2%	-37.9%
Financials	16.5%	-31.6%	-24.7%
Health Care	14.3%	-8.9%	7.1%
Industrials	14.2%	-26.4%	-16.0%
Information Technology	7.6%	-17.7%	-1.7%
Materials	6.7%	-26.8%	-20.5%
Real Estate	3.3%	-27.6%	-27.1%
Utilities	4.2%	-13.2%	-5.1%
Total	100.0%	-22.8%	-14.4%

MSCI - ACWixUS	Sector Weight	Quarter Return	1-Year Return
Communication Services	7.5%	-14.1%	-9.9%
Consumer Discretionary	11.8%	-24.1%	-12.9%
Consumer Staples	10.5%	-14.7%	-9.9%
Energy	5.2%	-38.5%	-37.1%
Financials	19.2%	-31.0%	-24.9%
Health Care	10.5%	-9.2%	4.6%
Industrials	11.4%	-26.2%	-17.1%
Information Technology	10.2%	-17.5%	1.3%
Materials	7.0%	-27.5%	-22.8%
Real Estate	3.0%	-27.6%	-25.9%
Utilities	3.7%	-15.9%	-8.7%
Total	100.0%	-23.4%	-15.6%

MSCI - Emerging Mkt	Sector Weight	Quarter Return	1-Year Return
Communication Services	13.1%	-9.6%	-8.2%
Consumer Discretionary	15.4%	-18.1%	-8.3%
Consumer Staples	6.6%	-19.8%	-15.7%
Energy	5.9%	-39.9%	-35.8%
Financials	21.6%	-31.1%	-27.6%
Health Care	3.6%	-8.5%	-8.5%
Industrials	4.9%	-28.0%	-26.5%
Information Technology	16.9%	-17.8%	3.2%
Materials	6.7%	-30.7%	-31.3%
Real Estate	2.9%	-26.7%	-21.5%
Utilities	2.5%	-26.0%	-23.4%
Total	100.0%	-23.6%	-17.7%

Country	MSCI-EAFE Weight	MSCI-ACWixUS Weight	Quarter Return	1- Year Return
Japan	26.3%	17.4%	-16.8%	-6.7%
United Kingdom	15.1%	10.0%	-28.8%	-23.0%
France	10.8%	7.1%	-27.6%	-17.7%
Switzerland	10.7%	7.1%	-11.5%	3.5%
Germany	8.3%	5.5%	-27.0%	-17.5%
Australia	5.9%	3.9%	-33.3%	-26.3%
Netherlands	4.2%	2.7%	-20.7%	-7.7%
Hong Kong	3.8%	2.5%	-17.3%	-21.1%
Sweden	2.8%	1.8%	-21.4%	-11.2%
Spain	2.6%	1.7%	-29.8%	-26.5%
Denmark	2.2%	1.4%	-8.0%	4.5%
Italy	2.2%	1.4%	-29.3%	-21.4%
Singapore	1.2%	0.8%	-28.2%	-22.3%
Finland	1.0%	0.7%	-19.1%	-18.0%
Belgium	0.9%	0.6%	-32.6%	-30.2%
Israel	0.6%	0.4%	-18.1%	-18.4%
Ireland	0.6%	0.4%	-25.7%	-8.3%
Norway	0.5%	0.4%	-33.4%	-31.3%
New Zealand	0.3%	0.2%	-16.4%	-1.0%
Portugal	0.2%	0.1%	-13.1%	-2.5%
Austria	0.2%	0.1%	-42.9%	-39.7%
Total EAFE Countries	100.0%	66.0%	-22.8%	-14.4%
Canada	6.3%	6.3%	-27.5%	-19.9%
Total Developed Countries		72.3%	-23.3%	-14.9%
China		11.3%	-10.2%	-5.8%
Taiwan		3.4%	-19.1%	1.3%
Korea		3.3%	-22.5%	-16.8%
India		2.1%	-31.1%	-30.9%
Brazil		1.4%	-50.2%	-41.9%
South Africa		1.0%	-40.3%	-37.1%
Russia		0.9%	-36.4%	-14.4%
Saudi Arabia		0.7%	-24.0%	-28.9%
Thailand		0.6%	-33.8%	-32.5%
Mexico		0.5%	-35.5%	-31.9%
Malaysia		0.5%	-19.2%	-21.1%
Indonesia		0.4%	-39.6%	-36.8%
Qatar		0.3%	-17.3%	-15.1%
Philippines		0.2%	-32.2%	-30.5%
Poland		0.2%	-36.5%	-39.9%
Chile		0.2%	-33.6%	-47.1%
United Arab Emirates		0.2%	-27.1%	-30.3%
Turkey		0.1%	-30.1%	-19.8%
Peru		0.1%	-35.8%	-39.4%
Colombia		0.1%	-49.7%	-47.3%
Hungary		0.1%	-39.0%	-31.3%
Greece		0.1%	-45.2%	-30.4%
Argentina		0.0%	-39.3%	-51.0%
Egypt		0.0%	-27.1%	-10.8%
Czech Republic		0.0%	-38.5%	-38.3%
Pakistan		0.0%	-39.7%	-39.0%
Total Emerging Countries		27.7%	-23.6%	-17.7%
Total ACWixUS Countries		100.0%	-23.4%	-15.6%

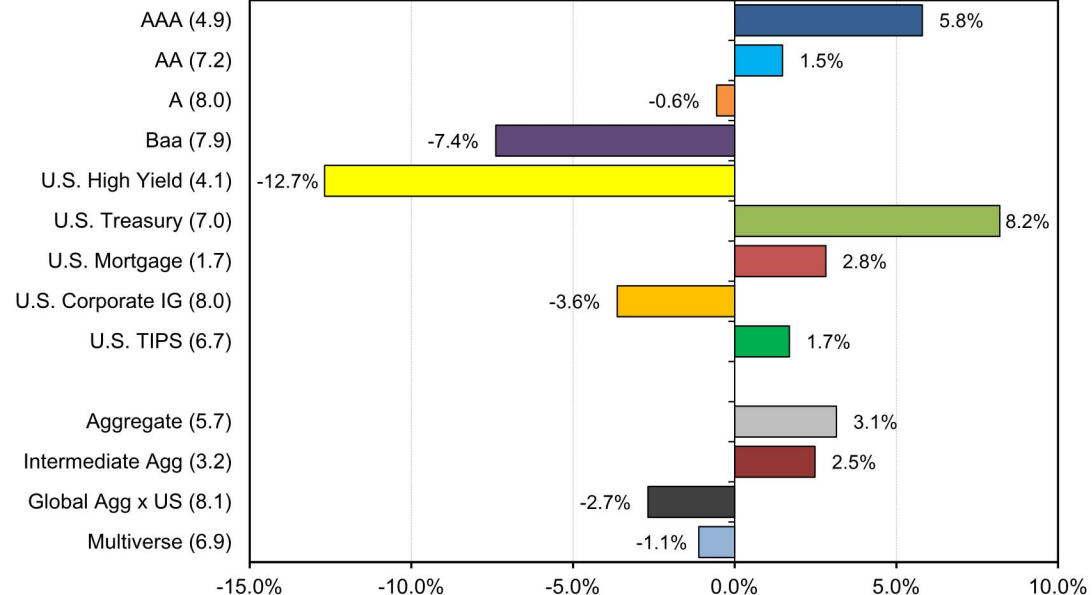
Source: Morningstar Direct, MSCI Global Index Monitor (Returns are Net in USD)

As a result of the GICS classification changes on 9/28/2018 and certain associated reporting limitations, sector performance represents backward looking performance for the prior year of each sector's current constituency, post creation of the Communication Services sector.

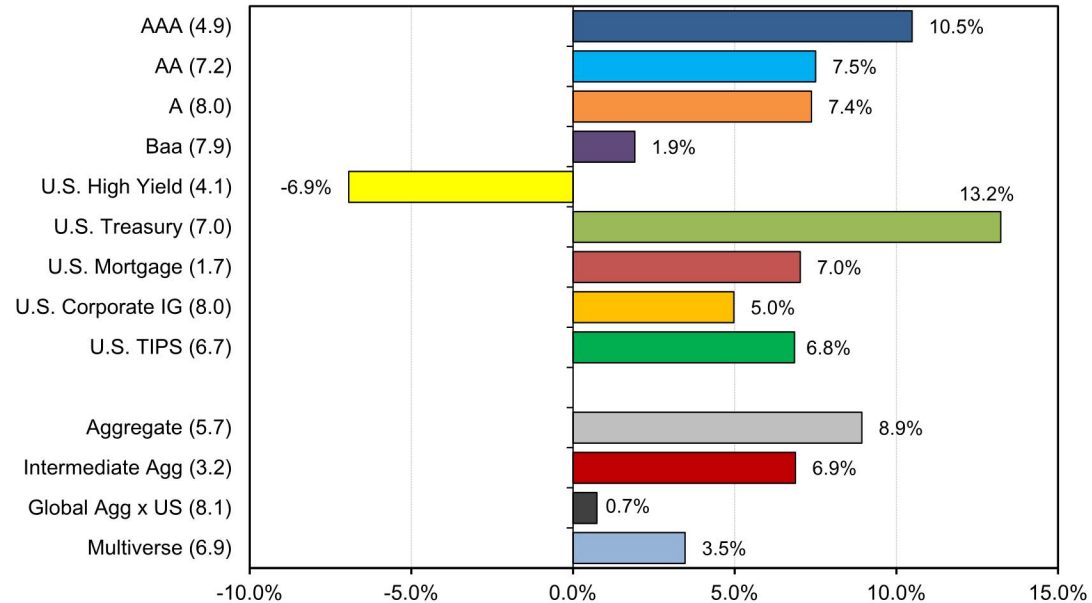


- Fixed income market returns during the 1st quarter were bifurcated between high- and low-quality bonds. Interest rates fell across the US Treasury Yield Curve through the quarter as investors sought safety and lower volatility assets. As a result of the deterioration of the US economy, the Fed took unprecedented action and lowered interest rates to between 0% to 0.25%. As a result, short term interest rates fell dramatically. The benchmark US Treasury 10-Year bond yield fell by more than 120 basis points during the quarter ending the period at a yield of 0.70%. In addition to lowering interest rates, the Fed committed to purchasing near unlimited US Treasury bonds and Agency mortgage bonds while implementing additional programs that allow for the purchase of corporate bonds. The bellwether Bloomberg Barclays US Aggregate Index posted positive returns for both the 1st quarter and the 1-year period, returning 3.1% and 8.9%, respectively.
- Within investment grade credit, higher quality issues outperformed lower quality issues during the quarter. More specifically, investors rotated out of lower quality issues due to the expectation for deterioration in the economy as a result of shelter-in-place protection measures. On an absolute basis, without negating the duration differences in the sub-indices, high yield credit was the worst performing sector returning -12.7% for the quarter, while AAA was the best performing, returning 5.8%. High yield spreads relative to comparable US Treasury issues widened to their highest levels since the 2008 Financial Crisis at nearly 1,100 basis points. Within investment grade bonds, Baa also underperformed, returning -7.4%. Much has been made in recent years about the growth of Baa bond issues outstanding and the potential for downgrades should a recession ensue. Returns over the 1-year period show generally positive returns with only high yield bonds posting a negative result. Within investment grade bonds, AAA bonds outperformed returning 10.5% compared to 7.5%, 7.4% and 1.9%, respectively, for AA, A and Baa rated issues.
- Within the Bloomberg Barclays US Aggregate Bond Index, defensive US Treasury, government agency and mortgage backed sectors outperformed investment grade corporate issues over the 1-year period. The defensive sectors benefited from the flight to quality as investors preferred lower volatility issues despite their lower relative yields. Over the 1-year period, US Treasury bonds returned 13.2% while US mortgage backed and investment grade corporate issues returned 7.0% versus a 5.0%, respectively. High yield bonds were the only negative performer for the year in the chart primarily due to the quarter's dramatic spread widening and resulting weak performance. Additionally, commodity-related lower quality issues were negatively impacted with the significant decline in oil prices.

Quarter Performance



1-Year Performance

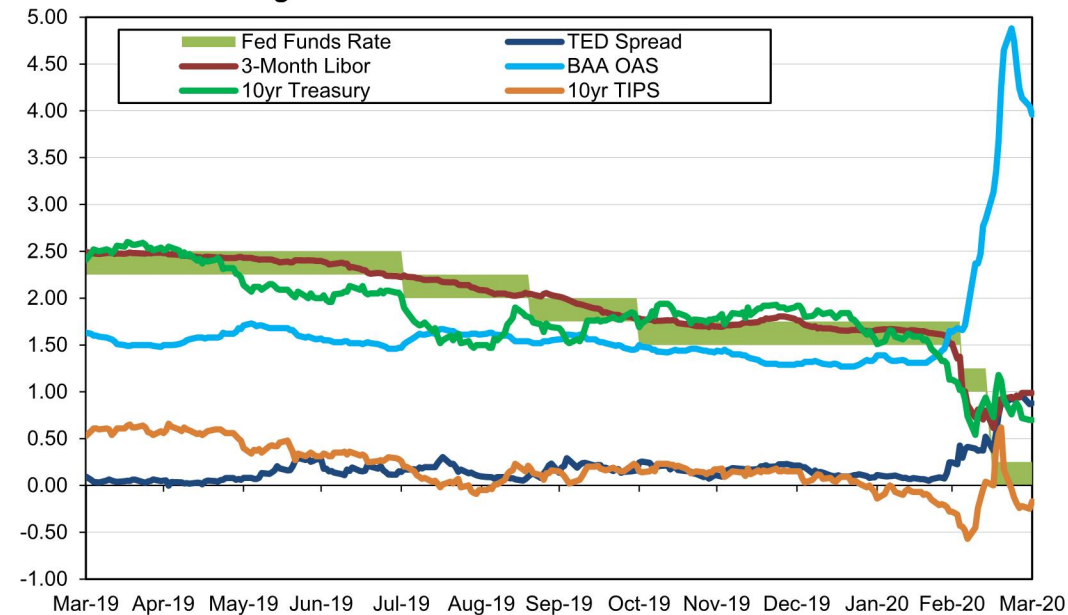


Source: Bloomberg

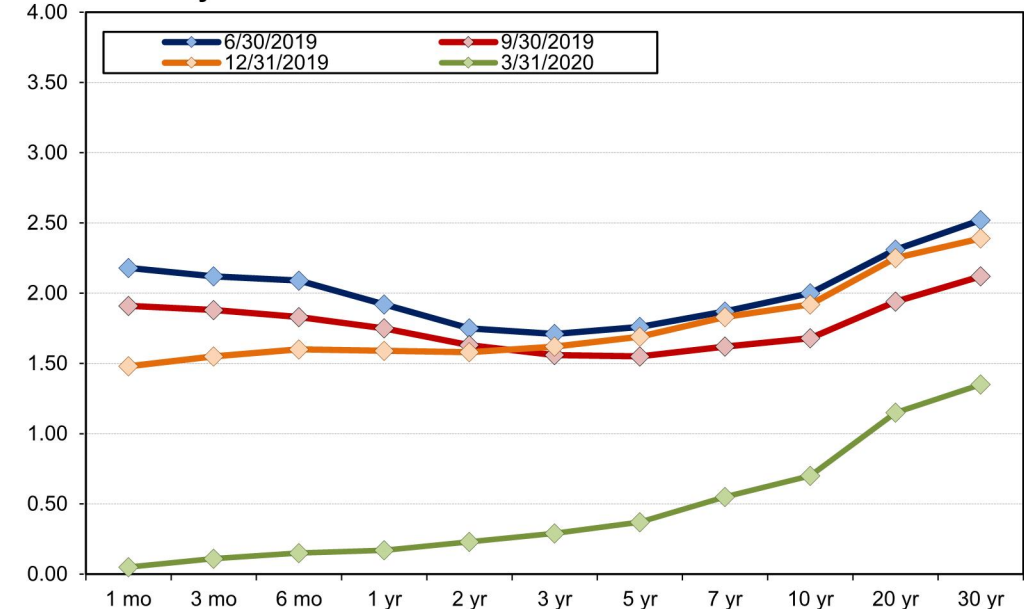


- Global fixed income returns continued their relative underperformance when compared to their domestic counterparts during the 1st quarter. Yields across developed markets fell in the first quarter following the onset of the Coronavirus. While the number of negative yielding bonds has recently subsided, countries such as Germany, Sweden and Switzerland continue to have lower, or in some cases negative yields. As mentioned, the USD appreciated against most developed currencies during the quarter, acting as a headwind to global bond index performance. The return on global bonds, as represented by the Bloomberg Barclays Global Aggregate ex US Index, was -2.7% for the period. Global bonds also trailed over the 1-year period with the Global Aggregate ex US Index returning 0.7% versus 8.9% return for the domestic Bloomberg Barclays Aggregate Index. Global growth is expected to slow considerably in the 1st and 2nd quarters as countries continue to manage through the Coronavirus pandemic. Importantly, global central banks are acting in coordination to provide sufficient liquidity in an effort to calm markets. As a result, interest rates, and bond returns, are expected to remain low until economic activity resumes.
- Much of the index performance detailed in the bar graphs on the previous page is visible on a time series basis by reviewing the line graphs to the right. The '1-Year Trailing Market Rates' chart illustrates that over the last year, the 10-year Treasury yield (green line) has fallen from roughly 2.5% to roughly 0.7%. The blue line illustrates changes in the BAA OAS (Option Adjusted Spread). This measure quantifies the additional yield premium that investors require to purchase and hold non-Treasury issues. This line illustrates an abrupt increase in credit spreads during the 1st quarter of 2020 as investors moved to higher quality assets during the quarter's risk-off environment. Prior to that, spreads had remained relatively range bound over the previous three quarters as investors sought out higher relative yields in corporate bonds. The orange line illustrates US Treasury TIPS which reflect investor expectations of future inflation. Over the trailing year, TIPS yields had already been trending generally lower due to concerns about the sustainability of global economic growth. Following the drawdown in the 1st quarter, TIPS yields were negative as investors believed that the US economy would enter a recession.
- The lower graph provides a snapshot of the US Treasury yield curve at the end of each of the last four calendar quarters. The downward shift in US interest rates is clearly visible over the last quarter. The primary driver of this change in the curve was due to the supportive actions taken by the Fed, which reversed recent interest rate increases, and a broad flight to the perceived safety of US Treasury securities.

1-Year Trailing Market Rates



Treasury Yield Curve

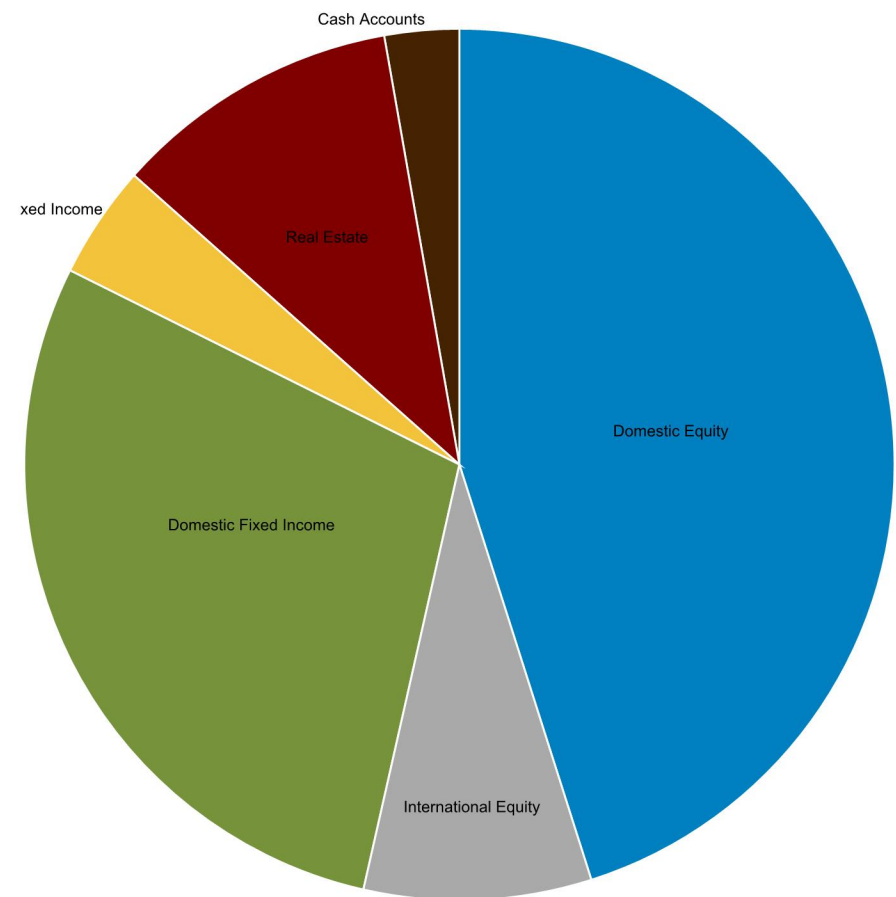
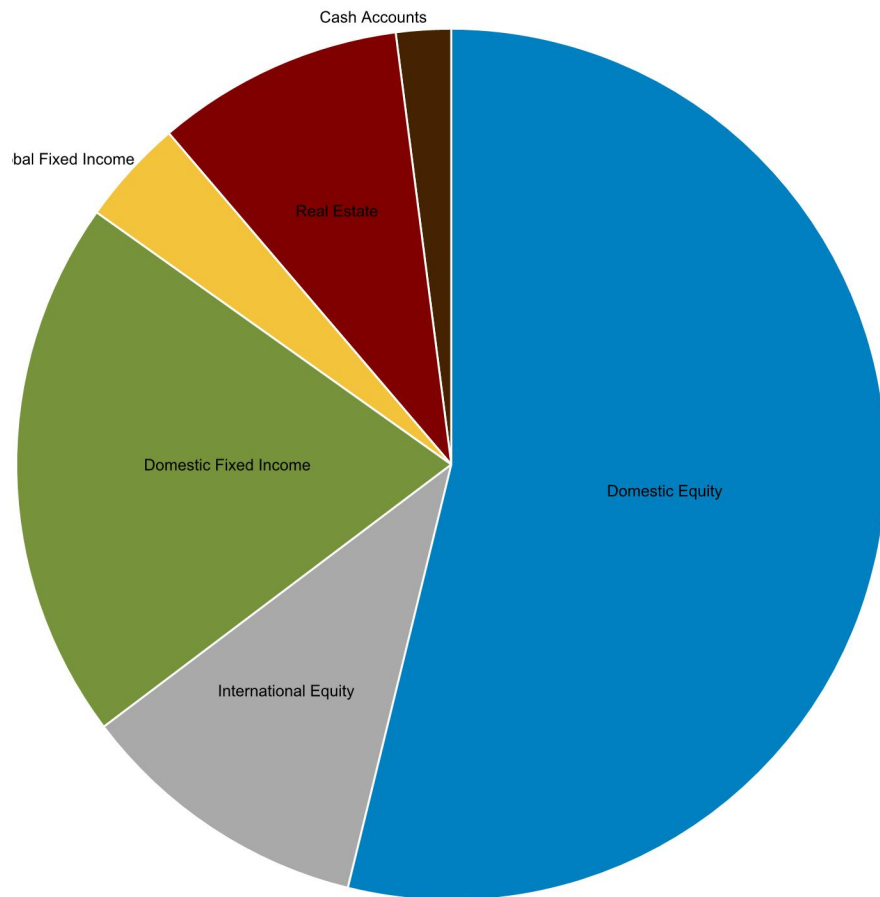


Source: US Department of Treasury, FRED (Federal Reserve of St. Louis)



December 31, 2019 : \$28,467,879

March 31, 2020 : \$24,619,667



Allocation			Allocation		
	Market Value	Allocation		Market Value	Allocation
Domestic Equity	15,323,517	53.8	Domestic Equity	11,102,773	45.1
International Equity	3,103,099	10.9	International Equity	2,079,860	8.4
Domestic Fixed Income	5,721,044	20.1	Domestic Fixed Income	7,091,940	28.8
Global Fixed Income	1,117,553	3.9	Global Fixed Income	1,033,913	4.2
Real Estate	2,619,498	9.2	Real Estate	2,628,440	10.7
Cash Accounts	583,168	2.0	Cash Accounts	682,742	2.8



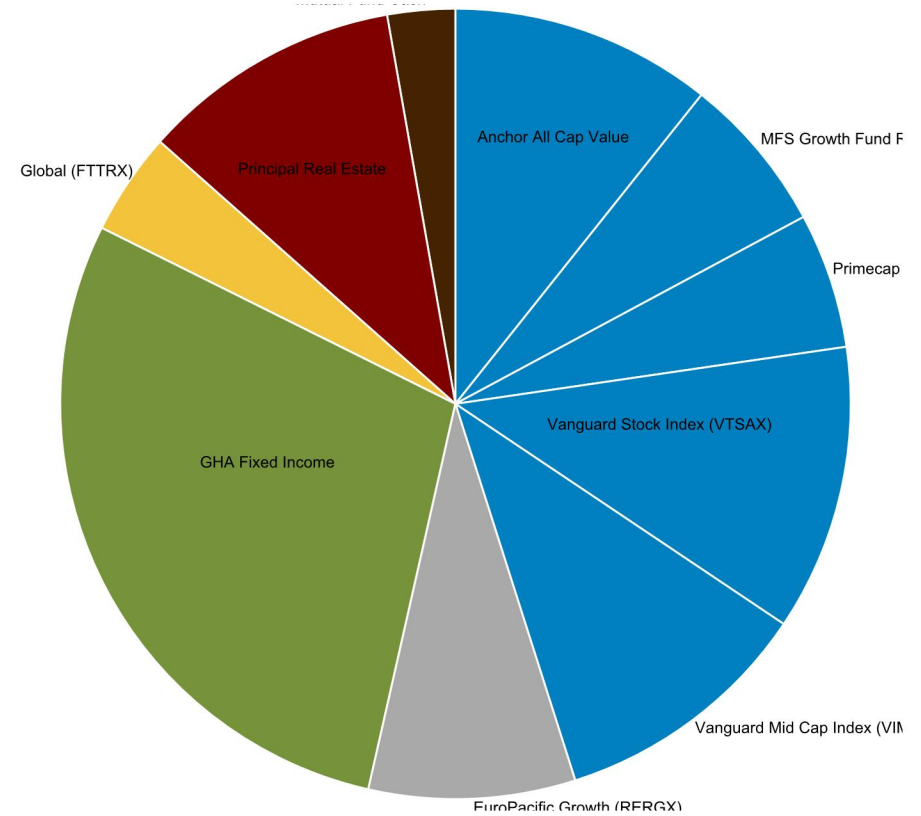
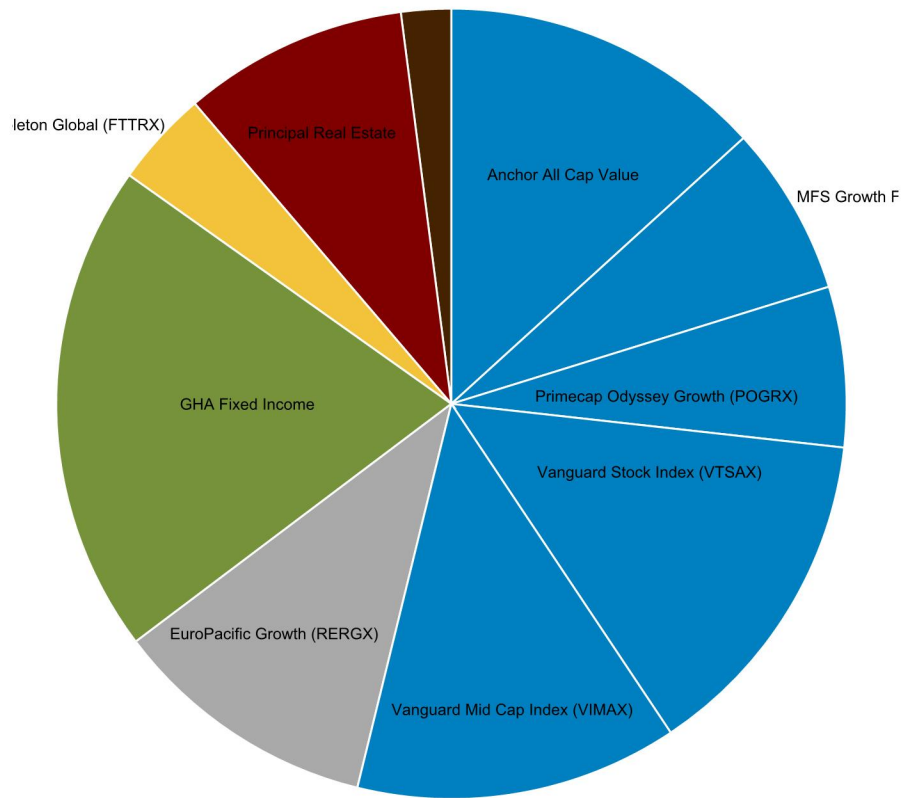
Palm Springs General Employees' Pension Plan

Asset Allocation by Manager

As of March 31, 2020

December 31, 2019 : \$28,467,879

March 31, 2020 : \$24,619,667



Allocation

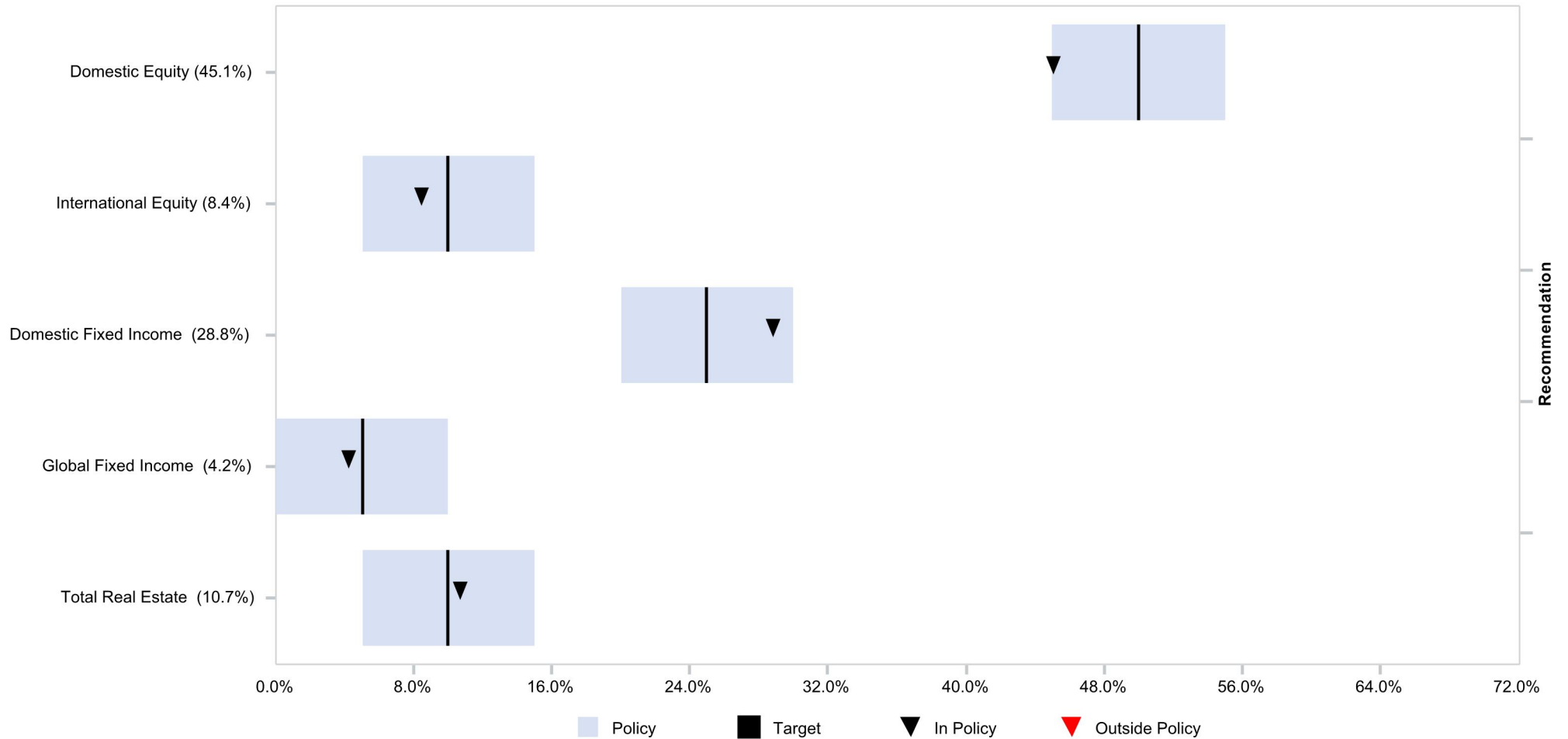
	Market Value	Allocation
Anchor All Cap Value	3,771,057	13.2
MFS Growth Fund R6 (MFEKX)	1,982,236	7.0
Primecap Odyssey Growth (POGRX)	1,866,450	6.6
Vanguard Stock Index (VTSAX)	3,948,548	13.9
Vanguard Mid Cap Index (VIMAX)	3,755,227	13.2
EuroPacific Growth (RERGX)	3,103,099	10.9
GHA Fixed Income	5,721,044	20.1
Templeton Global (FTTRX)	1,117,553	3.9
Principal Real Estate	2,619,498	9.2
Mutual Fund Cash	583,168	2.0
Village	-	0.0

Allocation

	Market Value	Allocation
Anchor All Cap Value	2,634,122	10.7
MFS Growth Fund R6 (MFEKX)	1,588,249	6.5
Primecap Odyssey Growth (POGRX)	1,362,942	5.5
Vanguard Stock Index (VTSAX)	2,883,903	11.7
Vanguard Mid Cap Index (VIMAX)	2,633,557	10.7
EuroPacific Growth (RERGX)	2,079,860	8.4
GHA Fixed Income	7,091,940	28.8
Templeton Global (FTTRX)	1,033,913	4.2
Principal Real Estate	2,628,440	10.7
Mutual Fund Cash	682,742	2.8
Village	-	0.0



Executive Summary

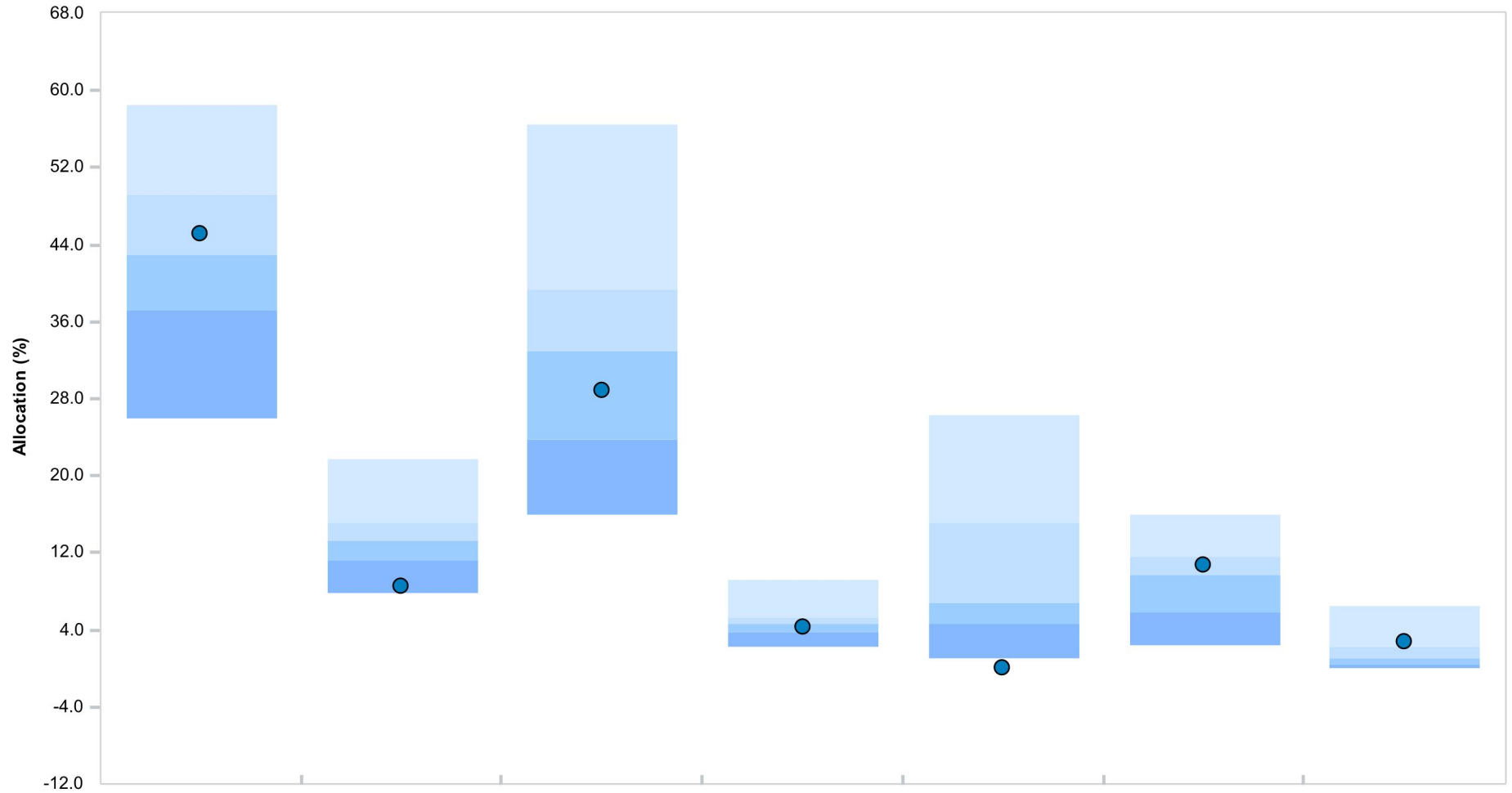


Asset Allocation Compliance

	Minimum Allocation (%)	Maximum Allocation (%)	Current Allocation (%)	Target Allocation (%)
Global Fixed Income	0.0	10.0	4.2	5.0
International Equity	5.0	15.0	8.4	10.0
Total Real Estate	5.0	15.0	10.7	10.0
Domestic Fixed Income	20.0	30.0	28.8	25.0
Domestic Equity	45.0	55.0	45.1	50.0
Total Fund Composite	N/A	N/A	100.0	100.0



Plan Sponsor TF Asset Allocation vs. All Public Plans-Total Fund



Parentheses contain percentile rankings.



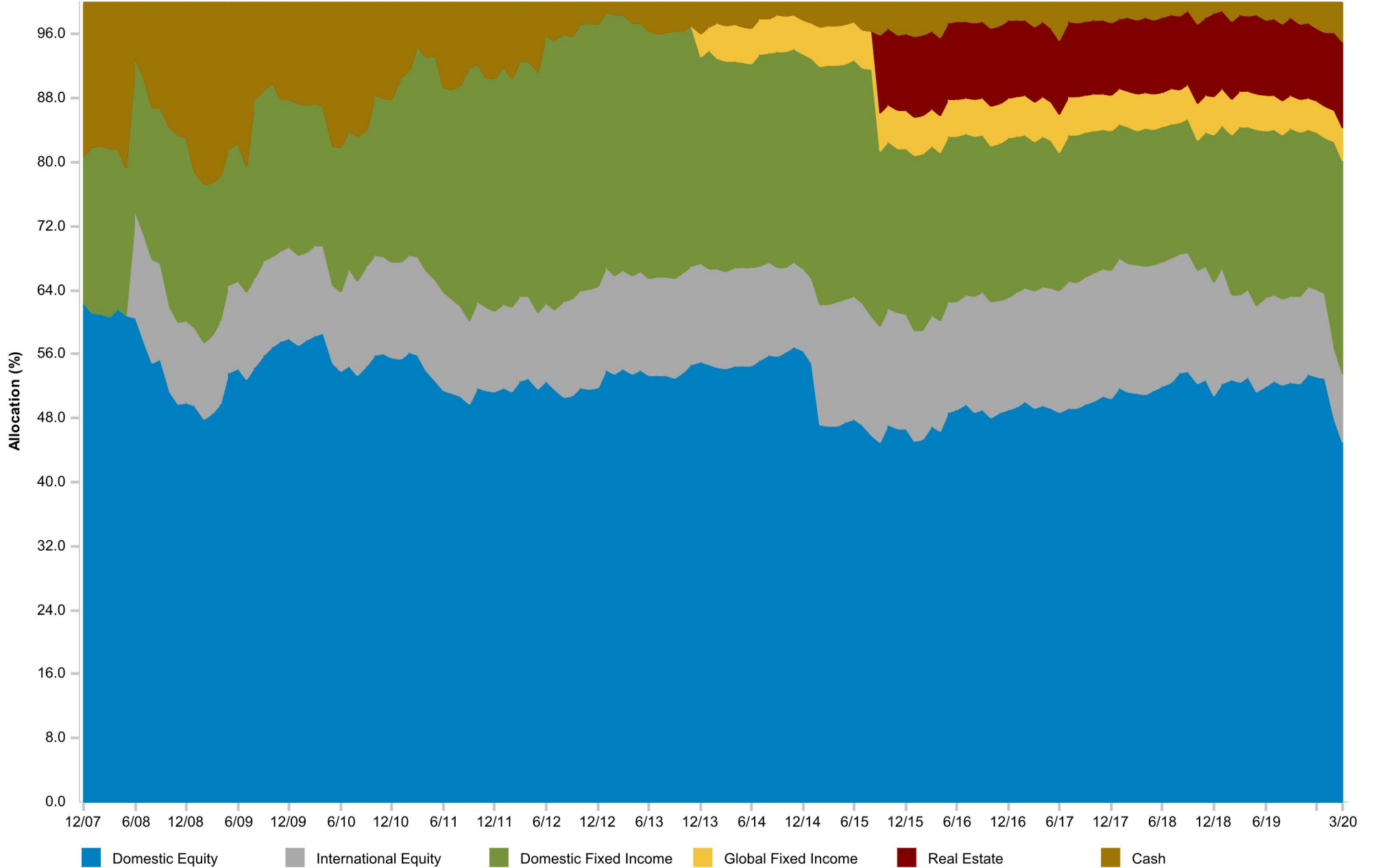
Palm Springs General Employees' Pension Plan

Asset Allocation History by Portfolio

As of March 31, 2020

	Mar-2020		Dec-2019		Sep-2019		Jun-2019		Mar-2019	
	(\$)	%	(\$)	%	(\$)	%	(\$)	%	(\$)	%
Total Equity	13,182,633	53.55	18,426,617	64.73	17,263,851	64.05	17,218,528	64.33	16,836,878	64.32
Domestic Equity	11,102,773	45.10	15,323,517	53.83	14,360,178	53.28	14,267,931	53.30	13,991,858	53.45
Anchor All Cap Value	2,634,122	10.70	3,771,057	13.25	3,597,467	13.35	3,498,736	13.07	3,417,785	13.06
Vanguard Mid Cap Index (VIMAX)	2,633,557	10.70	3,755,227	13.19	3,533,140	13.11	3,522,929	13.16	3,387,294	12.94
Vanguard Stock Index (VTSAX)	2,883,903	11.71	3,948,548	13.87	3,641,840	13.51	3,618,570	13.52	3,489,282	13.33
MFS Growth Fund R6 (MFEKX)	1,588,249	6.45	1,982,236	6.96	1,848,021	6.86	1,834,646	6.85	1,916,756	7.32
Primecap Odyssey Growth (POGRX)	1,362,942	5.54	1,866,450	6.56	1,739,710	6.45	1,793,050	6.70	1,780,741	6.80
International Equity	2,079,860	8.45	3,103,099	10.90	2,903,674	10.77	2,950,598	11.02	2,845,020	10.87
EuroPacific Growth (RERGX)	2,079,860	8.45	3,103,099	10.90	2,903,674	10.77	2,950,598	11.02	2,845,020	10.87
Total Fixed Income	8,125,853	33.01	6,838,596	24.02	6,866,264	25.47	6,870,994	25.67	6,810,878	26.02
Domestic Fixed Income	7,091,940	28.81	5,721,044	20.10	5,742,665	21.31	5,697,009	21.28	5,635,885	21.53
GHA Fixed Income	7,091,940	28.81	5,721,044	20.10	5,742,665	21.31	5,697,009	21.28	5,635,885	21.53
Global Fixed Income	1,033,913	4.20	1,117,553	3.93	1,123,599	4.17	1,173,985	4.39	1,174,992	4.49
Templeton Global Total Return (FTTRX)	1,033,913	4.20	1,117,553	3.93	1,123,599	4.17	1,173,985	4.39	1,174,992	4.49
Total Real Estate	2,628,440	10.68	2,619,498	9.20	2,587,151	9.60	2,546,689	9.51	2,514,904	9.61
Principal Real Estate	2,628,440	10.68	2,619,498	9.20	2,587,151	9.60	2,546,689	9.51	2,514,904	9.61
Mutual Fund Cash	682,742	2.77	583,168	2.05	237,113	0.88	131,112	0.49	12,858	0.05
Total Fund Composite	24,619,667	100.00	28,467,879	100.00	26,954,379	100.00	26,767,323	100.00	26,175,518	100.00





Palm Springs General Employees' Pension Plan

Financial Reconciliation

1 Quarter Ending March 31, 2020

	Market Value 01/01/2020	Net Transfers	Contributions	Distributions	Management Fees	Other Expenses	Income	Capital Gain/Loss	Market Value 03/31/2020
Total Equity	18,426,617	-1,442,956	-	-	-4,714	-	247,015	-4,043,329	13,182,633
Domestic Equity	15,323,517	-1,022,956	-	-	-4,714	-	247,015	-3,440,090	11,102,773
Anchor All Cap Value	3,771,057	-214,696	-	-	-4,714	-	18,755	-936,280	2,634,122
MFS Growth Fund R6 (MFEKX)	1,982,236	-200,000	-	-	-	-	200,000	-393,987	1,588,249
Primecap Odyssey Growth (POGRX)	1,866,450	-80,000	-	-	-	-	-	-423,508	1,362,942
Vanguard Mid Cap Index (VIMAX)	3,755,227	-214,633	-	-	-	-	14,633	-921,670	2,633,557
Vanguard Stock Index (VTSAX)	3,948,548	-313,627	-	-	-	-	13,627	-764,645	2,883,903
International Equity	3,103,099	-420,000	-	-	-	-	-	-603,239	2,079,860
EuroPacific Growth (RERGX)	3,103,099	-420,000	-	-	-	-	-	-603,239	2,079,860
Total Fixed Income	6,838,596	1,353,367	-	-	-3,575	-	52,315	-114,852	8,125,853
Domestic Fixed Income	5,721,044	1,368,926	-	-	-3,575	-	36,756	-31,211	7,091,940
GHA Fixed Income	5,721,044	1,368,926	-	-	-3,575	-	36,756	-31,211	7,091,940
Global Fixed Income	1,117,553	-15,559	-	-	-	-	15,559	-83,640	1,033,913
Templeton Global Total Return (FTTRX)	1,117,553	-15,559	-	-	-	-	15,559	-83,640	1,033,913
Total Real Estate	2,619,498	-	-	-	-	-	-	8,942	2,628,440
Principal Real Estate	2,619,498	-	-	-	-	-	-	8,942	2,628,440
Cash Accounts									
Mutual Fund Cash	583,168	97,877	-	-	-	-	1,696	-	682,742
Village	-	-8,289	44,756	-	-	-36,467	-	-	-
Total Fund Composite	28,467,879	-	44,756	-	-8,289	-36,467	301,026	-4,149,238	24,619,667



Palm Springs General Employees' Pension Plan

Financial Reconciliation

October 1, 2019 To March 31, 2020

	Market Value 10/01/2019	Net Transfers	Contributions	Distributions	Management Fees	Other Expenses	Income	Capital Gain/Loss	Market Value 03/31/2020
Total Equity	17,263,851	-1,717,041	-	-	-4,714	-	356,515	-2,715,978	13,182,633
Domestic Equity	14,360,178	-1,204,004	-	-	-4,714	-	317,915	-2,366,601	11,102,773
Anchor All Cap Value	3,597,467	-234,494	-	-	-4,714	-	38,338	-762,475	2,634,122
MFS Growth Fund R6 (MFEKX)	1,848,021	-223,526	-	-	-	-	200,000	-236,246	1,588,249
Primecap Odyssey Growth (POGRX)	1,739,710	-175,672	-	-	-	-	9,264	-210,360	1,362,942
Vanguard Mid Cap Index (VIMAX)	3,533,140	-235,435	-	-	-	-	35,435	-699,583	2,633,557
Vanguard Stock Index (VTSAX)	3,641,840	-334,878	-	-	-	-	34,878	-457,937	2,883,903
International Equity	2,903,674	-513,037	-	-	-	-	38,600	-349,377	2,079,860
EuroPacific Growth (RERGX)	2,903,674	-513,037	-	-	-	-	38,600	-349,377	2,079,860
Total Fixed Income	6,866,264	1,282,535	-	-	-3,575	-	114,347	-133,718	8,125,853
Domestic Fixed Income	5,742,665	1,324,778	-	-	-3,575	-	72,104	-44,032	7,091,940
GHA Fixed Income	5,742,665	1,324,778	-	-	-3,575	-	72,104	-44,032	7,091,940
Global Fixed Income	1,123,599	-42,243	-	-	-	-	42,243	-89,686	1,033,913
Templeton Global Total Return (FTTRX)	1,123,599	-42,243	-	-	-	-	42,243	-89,686	1,033,913
Total Real Estate	2,587,151	-	-	-	-	-	-	41,289	2,628,440
Principal Real Estate	2,587,151	-	-	-	-	-	-	41,289	2,628,440
Cash Accounts									
Mutual Fund Cash	237,113	442,795	-	-	-	-	2,834	-	682,742
Village	-	-8,289	48,523	-	-	-40,234	-	-	-
Total Fund Composite	26,954,379	-	48,523	-	-8,289	-40,234	473,695	-2,808,407	24,619,667



Palm Springs General Employees' Pension Plan

Trailing Returns

As of March 31, 2020

	QTR		FYTD		1 YR		3 YR		5 YR		7 YR		Inception		Inception Date
Total Fund (Gross)	-13.52	(48)	-8.66	(46)	-5.22	(48)	3.36	(24)	4.21	(9)	5.81	(15)	6.29	(13)	02/01/2005
Total Fund Policy	-13.40	(46)	-8.02	(25)	-4.15	(29)	3.91	(14)	4.83	(2)	6.33	(5)	5.80	(48)	
All Public Plans-Total Fund Median	-13.57		-8.99		-5.30		2.89		3.35		5.18		5.74		
Total Fund (Net)	-13.54		-8.69		-5.32		3.22		4.00		5.54		5.98		02/01/2005
Total Equity	-21.93		-15.42		-11.69		2.22		3.95		6.51		8.27		03/01/2010
Total Equity Policy	-21.41		-14.27		-10.48		2.77		4.43		7.40		9.14		
Domestic Equity	-21.98	(53)	-15.75	(48)	-11.64	(50)	2.71	(41)	4.79	(31)	7.63	(40)	8.17	(2)	01/01/2005
Total Domestic Equity Policy	-20.90	(40)	-13.70	(29)	-9.13	(30)	4.00	(22)	5.77	(14)	8.96	(13)	7.36	(13)	
IM U.S. All Cap Core Equity (SA+CF+MF) Median	-21.66		-16.06		-11.72		1.92		3.40		7.03		5.97		
International Equity	-21.64	(20)	-13.72	(15)	-11.80	(16)	0.63	(8)	1.12	(1)	2.04	(1)	1.57	(17)	07/01/2008
Total International Equity Policy	-23.26	(33)	-16.37	(30)	-15.14	(32)	-1.48	(20)	-0.17	(1)	2.08	(1)	1.23	(26)	
IM International Large Cap Core Equity (MF) Median	-24.46		-17.63		-17.17		-3.55		-2.78		0.45		0.27		
Total Fixed Income	-0.56		0.06		2.64		2.43		2.50		2.64		3.95		01/01/2005
Total Fixed Income Policy	0.65		1.42		5.22		3.52		2.90		2.44		3.80		
Total Domestic Fixed Income	0.31	(77)	0.70	(81)	4.18	(88)	3.07	(87)	2.63	(81)	2.81	(28)	4.03	(53)	01/01/2005
Total Domestic Fixed Policy	2.49	(23)	2.96	(19)	6.88	(22)	3.87	(36)	2.82	(51)	2.46	(76)	3.80	(80)	
IM U.S. Intermediate Duration (SA+CF) Median	1.31		1.81		5.94		3.75		2.82		2.62		4.06		
Global Fixed Income	-6.15	(70)	-4.40	(63)	-6.00	(96)	-1.16	(98)	0.90	(88)	N/A		0.90	(81)	01/01/2014
Diversified Fixed Income Policy	-7.77	(87)	-5.96	(81)	-2.69	(85)	1.56	(78)	2.79	(7)	2.19	(21)	2.54	(23)	
IM Global Fixed Income (MF) Median	-3.20		-3.28		0.97		2.28		1.79		1.29		1.62		
Total Real Estate (Net)	0.34	(75)	1.60	(69)	4.51	(66)	6.71	(59)	N/A		N/A		7.48	(63)	10/01/2015
NCREIF Fund Index-Open End Diversified Core (EW)	0.90	(58)	2.44	(49)	5.25	(55)	7.04	(56)	8.74	(53)	10.01	(55)	7.96	(56)	
IM U.S. Open End Private Real Estate (SA+CF) Median	1.23		2.40		5.49		7.48		8.94		10.36		8.36		

Returns for periods greater than one year are annualized. Net and Gross returns are the same prior to 5/1/2009.
Returns prior to 3/31/2010 for Anchor All Cap Value are the equity returns from the Anchor balanced account.



Palm Springs General Employees' Pension Plan

Trailing Returns

As of March 31, 2020

	QTR		FYTD		1 YR		3 YR		5 YR		7 YR		Inception		Inception Date
Domestic Equity Strategies															
Anchor All Cap Value	-25.43	(26)	-21.41	(37)	-16.36	(36)	-1.19	(42)	2.23	(37)	5.68	(44)	7.40	(18)	01/01/2005
Russell 3000 Value Index	-27.32	(40)	-21.89	(38)	-18.02	(49)	-2.67	(52)	1.62	(45)	5.30	(51)	5.22	(73)	
IM U.S. All Cap Value Equity (SA+CF) Median	-28.94		-22.94		-18.82		-2.49		1.35		5.32		6.28		
MFS Growth Fund R6 (MFEKX)	-11.75	(18)	-4.21	(35)	3.26	(6)	N/A		N/A		N/A		7.60	(7)	03/01/2018
Russell 1000 Growth Index	-14.10	(64)	-4.98	(48)	0.91	(28)	11.32	(42)	10.36	(24)	12.93	(24)	4.98	(33)	
IM U.S. Large Cap Growth Equity (MF) Median	-13.43		-5.12		-0.82		10.65		9.07		11.86		3.89		
Primecap Odyssey Growth (POGRX)	-23.77	(100)	-13.98	(99)	-15.96	(100)	N/A		N/A		N/A		-8.13	(100)	03/01/2018
Russell 1000 Growth Index	-14.10	(64)	-4.98	(48)	0.91	(28)	11.32	(42)	10.36	(24)	12.93	(24)	4.98	(33)	
IM U.S. Large Cap Growth Equity (MF) Median	-13.43		-5.12		-0.82		10.65		9.07		11.86		3.89		
Vanguard Mid Cap Index (VIMAX)	-25.73	(27)	-20.62	(25)	-16.66	(21)	-0.27	(14)	N/A		N/A		3.26	(15)	06/01/2016
Russell Midcap Index	-27.07	(37)	-21.92	(39)	-18.31	(38)	-0.81	(18)	1.85	(18)	6.35	(14)	2.81	(20)	
IM U.S. Mid Cap Core Equity (MF) Median	-28.30		-23.24		-19.67		-3.64		-0.37		3.86		0.22		
Vanguard Stock Index (VTSAX)	-20.89	(39)	-13.77	(31)	-9.24	(32)	3.99	(22)	N/A		N/A		7.00	(16)	06/01/2016
Russell 3000 Index	-20.90	(40)	-13.70	(29)	-9.13	(30)	4.00	(21)	5.77	(13)	8.96	(13)	7.02	(15)	
IM U.S. Multi-Cap Core Equity (MF) Median	-21.69		-16.07		-11.73		1.79		3.30		6.99		4.84		
International Equity Strategies															
EuroPacific Growth (RERGX)	-22.43	(30)	-14.59	(25)	-12.69	(24)	0.29	(8)	0.91	(1)	N/A		0.94	(1)	03/01/2015
MSCI AC World ex USA	-23.26	(33)	-16.37	(30)	-15.14	(32)	-1.48	(20)	-0.17	(1)	1.53	(9)	-0.47	(1)	
IM International Large Cap Core Equity (MF) Median	-24.46		-17.63		-17.17		-3.55		-2.78		0.45		-2.96		
Domestic Fixed Income Strategies															
GHA Fixed Income	0.31	(77)	0.70	(81)	4.18	(88)	3.07	(87)	2.63	(81)	2.94	(17)	3.30	(8)	07/01/2012
Bloomberg Barclays Intermed Aggregate Index	2.49	(23)	2.96	(19)	6.88	(22)	3.87	(36)	2.82	(51)	2.62	(52)	2.58	(67)	
IM U.S. Intermediate Duration (SA+CF) Median	1.31		1.81		5.94		3.75		2.82		2.62		2.68		
Global Fixed Income Strategies															
Templeton Global Total Return (FTTRX)	-6.15	(70)	-4.40	(63)	-6.00	(96)	-1.16	(98)	0.90	(88)	N/A		0.88	(82)	01/01/2014
Diversified Fixed Income Policy	-7.77	(87)	-5.96	(81)	-2.69	(85)	1.56	(78)	2.79	(7)	2.19	(21)	2.54	(23)	
IM Global Fixed Income (MF) Median	-3.20		-3.28		0.97		2.28		1.79		1.29		1.62		
Real Estate Strategies															
Principal Real Estate (Net)	0.34	(75)	1.60	(69)	4.51	(66)	6.71	(59)	N/A		N/A		7.48	(63)	10/01/2015
NCREIF Fund Index-Open End Diversified Core (EW)	0.90	(58)	2.44	(49)	5.25	(55)	7.04	(56)	8.74	(53)	10.01	(55)	7.96	(56)	
IM U.S. Open End Private Real Estate (SA+CF) Median	1.23		2.40		5.49		7.48		8.94		10.36		8.36		

Returns for periods greater than one year are annualized. Net and Gross returns are the same prior to 5/1/2009.
Returns prior to 3/31/2010 for Anchor All Cap Value are the equity returns from the Anchor balanced account.



Palm Springs General Employees' Pension Plan

Fiscal Year Returns

As of March 31, 2020

	FYTD	FY Sep-2019	FY 2018	FY 2017	FY 2016	FY 2015	FY 2014	FY 2013	FY 2012	FY 2011
Total Fund (Gross)	-8.66 (46)	3.27 (78)	9.67 (11)	12.55 (37)	11.20 (17)	-0.08 (34)	9.03 (67)	13.66 (27)	18.50 (33)	-0.53 (76)
Total Fund Policy	-8.02 (25)	4.32 (50)	9.61 (12)	13.17 (25)	11.60 (12)	-1.35 (64)	11.09 (29)	13.56 (28)	18.57 (32)	0.64 (51)
All Public Plans-Total Fund Median	-8.99	4.31	7.09	11.82	9.74	-0.78	9.93	11.99	17.55	0.68
Total Fund (Net)	-8.69	3.16	9.51	12.33	10.90	-0.49	8.57	13.30	18.36	-1.16
Total Equity	-15.42	2.17	13.21	16.70	15.01	-1.64	10.99	20.75	24.70	-2.63
Total Equity Policy	-14.27	2.11	13.94	19.11	13.79	-3.15	14.86	22.30	26.46	-1.66
Domestic Equity	-15.75 (48)	2.35 (45)	16.86 (32)	15.56 (74)	16.92 (7)	-0.26 (32)	13.52 (76)	20.71 (70)	26.50 (54)	-0.44 (41)
Total Domestic Equity Policy	-13.70 (29)	2.92 (37)	17.58 (20)	18.71 (37)	14.96 (17)	-0.49 (35)	17.76 (32)	21.60 (61)	30.20 (19)	0.55 (33)
IM U.S. All Cap Core Equity (SA+CF+MF) Median	-16.06	1.54	14.88	17.66	11.64	-1.74	16.35	22.82	27.03	-1.28
International Equity	-13.72 (15)	1.15 (10)	1.47 (39)	20.63 (23)	8.52 (6)	-8.09 (46)	-0.43 (100)	20.93 (59)	15.57 (46)	-12.51 (79)
Total International Equity Policy	-16.37 (30)	-0.72 (25)	2.25 (15)	20.15 (23)	9.80 (4)	-11.78 (69)	5.52 (25)	24.29 (15)	14.33 (58)	-8.94 (18)
IM International Large Cap Core Equity (MF) Median	-17.63	-3.16	1.18	18.41	4.85	-8.36	4.07	21.59	15.06	-11.21
Total Fixed Income	0.06	6.37	-0.21	3.18	3.68	2.36	4.75	-0.10	7.61	2.78
Total Fixed Income Policy	1.42	7.92	-0.96	0.77	5.69	1.74	2.81	-1.63	5.12	4.96
Total Domestic Fixed Income	0.70 (81)	7.04 (84)	0.24 (19)	0.76 (45)	3.91 (49)	4.13 (3)	4.65 (11)	-0.10 (39)	7.61 (11)	2.78 (81)
Total Domestic Fixed Policy	2.96 (19)	8.08 (45)	-0.93 (95)	0.25 (86)	3.57 (73)	2.95 (31)	2.57 (68)	-1.63 (99)	5.12 (63)	4.96 (8)
IM U.S. Intermediate Duration (SA+CF) Median	1.81	8.01	-0.39	0.69	3.90	2.70	2.88	-0.27	5.56	3.61
Global Fixed Income	-4.40 (63)	2.50 (99)	-1.92 (66)	13.82 (1)	2.68 (94)	-8.03 (94)	N/A	N/A	N/A	N/A
Diversified Fixed Income Policy	-5.96 (81)	7.19 (57)	-1.16 (49)	2.83 (28)	14.46 (1)	-3.75 (49)	4.65 (36)	-1.58 (48)	14.19 (3)	2.52 (39)
IM Global Fixed Income (MF) Median	-3.28	7.65	-1.29	1.02	7.42	-3.85	3.37	-1.81	7.17	1.74
Total Real Estate (Net)	1.60 (69)	5.80 (74)	8.56 (60)	8.64 (35)	9.13 (91)	N/A	N/A	N/A	N/A	N/A
NCREIF Fund Index-Open End Diversified Core (EW)	2.44 (49)	6.17 (72)	8.82 (55)	7.81 (56)	10.62 (65)	14.71 (58)	12.39 (64)	12.47 (66)	11.77 (64)	18.03 (43)
IM U.S. Open End Private Real Estate (SA+CF) Median	2.40	6.89	8.98	8.05	11.02	15.32	12.63	13.18	12.89	16.62

Returns for periods greater than one year are annualized. Net and Gross returns are the same prior to 5/1/2009.
Returns prior to 3/31/2010 for Anchor All Cap Value are the equity returns from the Anchor balanced account.



Palm Springs General Employees' Pension Plan

Fiscal Year Returns

As of March 31, 2020

	FYTD	FY Sep-2019	FY 2018	FY 2017	FY 2016	FY 2015	FY 2014	FY 2013	FY 2012	FY 2011
Domestic Equity Strategies										
Anchor All Cap Value	-21.41 (37)	4.90 (32)	11.19 (58)	12.51 (91)	20.94 (10)	-5.74 (78)	16.59 (36)	22.10 (75)	21.96 (83)	2.88 (19)
Russell 3000 Value Index	-21.89 (38)	3.10 (43)	9.46 (75)	15.53 (72)	16.38 (30)	-4.22 (66)	17.66 (25)	22.67 (73)	31.05 (20)	-2.22 (63)
IM U.S. All Cap Value Equity (SA+CF) Median	-22.94	0.43	11.91	17.71	14.43	-2.86	15.29	26.41	27.69	-1.20
MFS Growth Fund R6 (MFEKX)	-4.21 (35)	7.56 (10)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Russell 1000 Growth Index	-4.98 (48)	3.71 (33)	26.30 (38)	21.94 (28)	13.76 (18)	3.17 (44)	19.15 (22)	19.27 (52)	29.19 (35)	3.78 (17)
IM U.S. Large Cap Growth Equity (MF) Median	-5.12	2.32	25.06	20.13	10.96	2.84	16.89	19.37	27.40	0.50
Primecap Odyssey Growth (POGRX)	-13.98 (99)	-10.70 (100)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Russell 1000 Growth Index	-4.98 (48)	3.71 (33)	26.30 (38)	21.94 (28)	13.76 (18)	3.17 (44)	19.15 (22)	19.27 (52)	29.19 (35)	3.78 (17)
IM U.S. Large Cap Growth Equity (MF) Median	-5.12	2.32	25.06	20.13	10.96	2.84	16.89	19.37	27.40	0.50
Vanguard Mid Cap Index (VIMAX)	-20.62 (25)	3.65 (24)	13.42 (30)	15.30 (49)	N/A	N/A	N/A	N/A	N/A	N/A
Russell Midcap Index	-21.92 (39)	3.19 (27)	13.98 (25)	15.32 (47)	14.25 (25)	-0.25 (34)	15.83 (16)	27.91 (44)	28.03 (33)	-0.88 (27)
IM U.S. Mid Cap Core Equity (MF) Median	-23.24	1.09	10.84	15.23	11.87	-1.05	12.32	27.52	26.17	-3.68
Vanguard Stock Index (VTSAX)	-13.77 (31)	2.92 (37)	17.62 (18)	18.64 (38)	N/A	N/A	N/A	N/A	N/A	N/A
Russell 3000 Index	-13.70 (29)	2.92 (37)	17.58 (19)	18.71 (36)	14.96 (17)	-0.49 (33)	17.76 (32)	21.60 (59)	30.20 (18)	0.55 (30)
IM U.S. Multi-Cap Core Equity (MF) Median	-16.07	1.47	14.71	17.56	11.62	-1.81	16.35	22.62	27.03	-1.53
International Equity Strategies										
EuroPacific Growth (RERGX)	-14.59 (25)	1.15 (10)	1.47 (39)	20.63 (23)	8.52 (6)	N/A	N/A	N/A	N/A	N/A
MSCI AC World ex USA	-16.37 (30)	-0.72 (25)	2.25 (15)	20.15 (23)	9.80 (4)	-11.78 (69)	5.22 (28)	16.98 (70)	15.04 (51)	-10.42 (28)
IM International Large Cap Core Equity (MF) Median	-17.63	-3.16	1.18	18.41	4.85	-8.36	4.07	21.59	15.06	-11.21
Manning & Napier Overseas (EXOSX)	N/A	N/A	N/A	N/A	N/A	N/A	-0.43 (98)	20.93 (51)	16.04 (34)	-12.51 (71)
MSCI EAFE Index	-16.37 (28)	-0.82 (20)	3.25 (14)	19.65 (36)	7.06 (42)	-8.27 (54)	4.70 (42)	24.29 (18)	14.33 (64)	-8.94 (16)
IM International Multi-Cap Core Equity (MF) Median	-17.35	-2.72	1.54	18.95	6.21	-8.02	4.34	21.03	14.97	-11.10

Returns for periods greater than one year are annualized. Net and Gross returns are the same prior to 5/1/2009.
Returns prior to 3/31/2010 for Anchor All Cap Value are the equity returns from the Anchor balanced account.



Palm Springs General Employees' Pension Plan

Fiscal Year Returns

As of March 31, 2020

	FYTD	FY Sep-2019	FY 2018	FY 2017	FY 2016	FY 2015	FY 2014	FY 2013	FY 2012	FY 2011
Domestic Fixed Income Strategies										
GHA Fixed Income	0.70 (81)	7.04 (84)	0.24 (19)	0.76 (45)	3.91 (49)	4.08 (3)	4.95 (9)	0.69 (12)	N/A	N/A
Bloomberg Barclays Intermed Aggregate Index	2.96 (19)	8.08 (45)	-0.93 (95)	0.25 (86)	3.57 (73)	2.95 (31)	2.74 (58)	-0.71 (77)	4.31 (84)	4.22 (23)
IM U.S. Intermediate Duration (SA+CF) Median	1.81	8.01	-0.39	0.69	3.90	2.70	2.88	-0.27	5.56	3.61
Vanguard TIPS (VIPIX)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	-6.21 (53)	9.06 (20)	N/A
Bloomberg Barclays U.S. TIPS Index	2.50 (13)	7.13 (9)	0.41 (41)	-0.73 (61)	6.58 (27)	-0.83 (7)	1.59 (19)	-6.10 (46)	9.10 (19)	9.87 (6)
IM U.S. TIPS (MF) Median	0.64	5.71	0.29	-0.41	5.77	-1.90	0.95	-6.17	8.21	8.10
Global Fixed Income Strategies										
Templeton Global Total Return (FTTRX)	-4.40 (63)	2.50 (99)	-1.92 (66)	13.82 (1)	2.68 (94)	-8.14 (94)	N/A	N/A	N/A	N/A
Diversified Fixed Income Policy	-5.96 (81)	7.19 (57)	-1.16 (49)	2.83 (28)	14.46 (1)	-3.75 (49)	4.65 (36)	-1.58 (48)	14.19 (3)	2.52 (39)
IM Global Fixed Income (MF) Median	-3.28	7.65	-1.29	1.02	7.42	-3.85	3.37	-1.81	7.17	1.74
Real Estate Strategies										
Principal Real Estate (Net)	1.60 (69)	5.80 (74)	8.56 (60)	8.64 (35)	9.13 (91)	N/A	N/A	N/A	N/A	N/A
NCREIF Fund Index-Open End Diversified Core (EW)	2.44 (49)	6.17 (72)	8.82 (55)	7.81 (56)	10.62 (65)	14.71 (58)	12.39 (64)	12.47 (66)	11.77 (64)	18.03 (43)
IM U.S. Open End Private Real Estate (SA+CF) Median	2.40	6.89	8.98	8.05	11.02	15.32	12.63	13.18	12.89	16.62

Returns for periods greater than one year are annualized. Net and Gross returns are the same prior to 5/1/2009.
Returns prior to 3/31/2010 for Anchor All Cap Value are the equity returns from the Anchor balanced account.

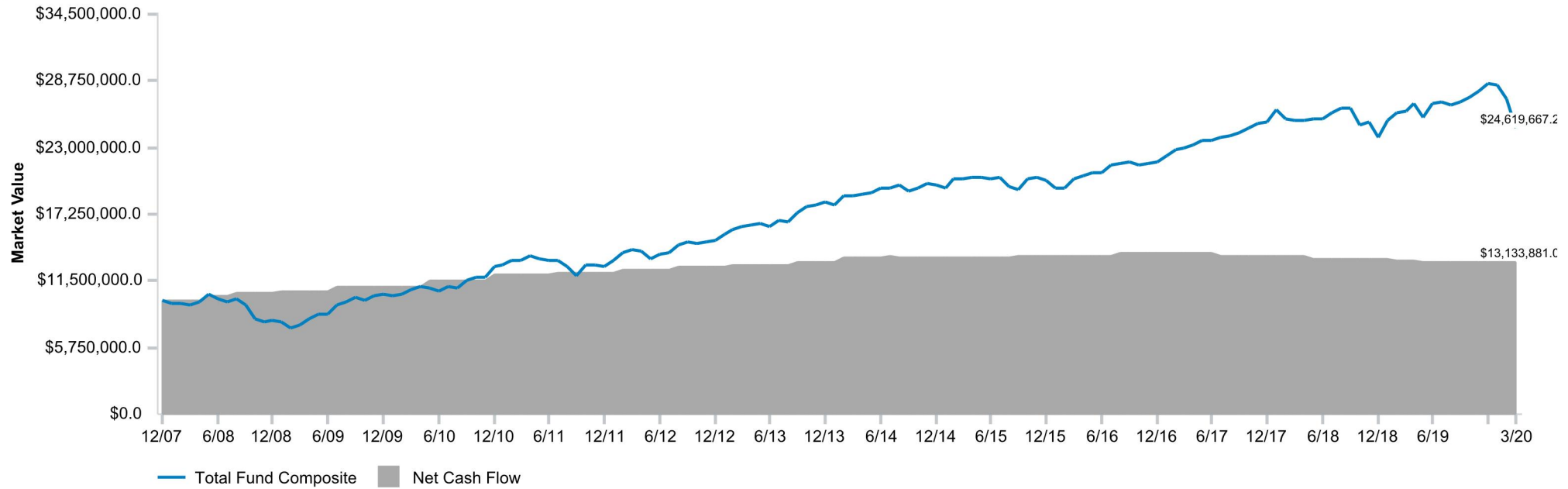


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Palm Springs General Employees' Pension Plan
Long-Term Performance
As of March 31, 2020

Plan Growth



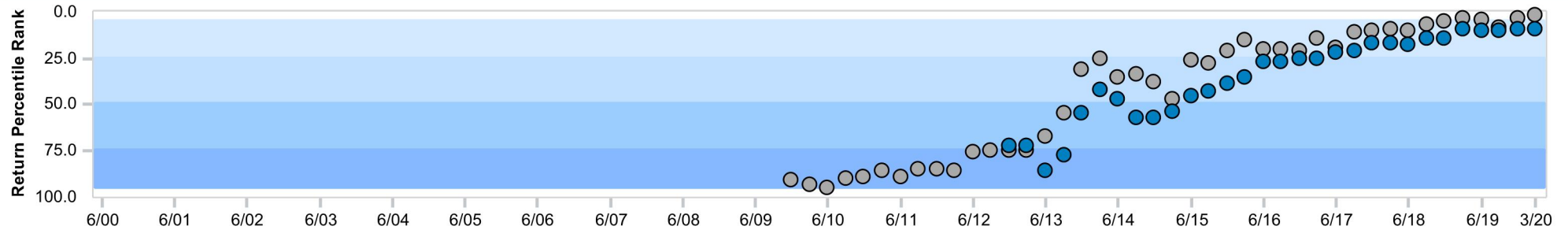
Trailing Returns

	QTR	YTD	1 YR	2 YR	3 YR	5 YR	7 YR	10 YR	15 YR
Total Fund Composite	-13.52 (48)	-13.52 (48)	-5.22 (48)	-0.44 (47)	3.36 (24)	4.21 (9)	5.81 (15)	6.78 (21)	6.23 (19)
Total Fund Policy	-13.40 (46)	-13.40 (46)	-4.15 (29)	0.69 (27)	3.91 (14)	4.83 (2)	6.33 (5)	7.17 (7)	5.83 (49)
Median	-13.57	-13.57	-5.30	-0.45	2.89	3.35	5.18	6.37	5.78

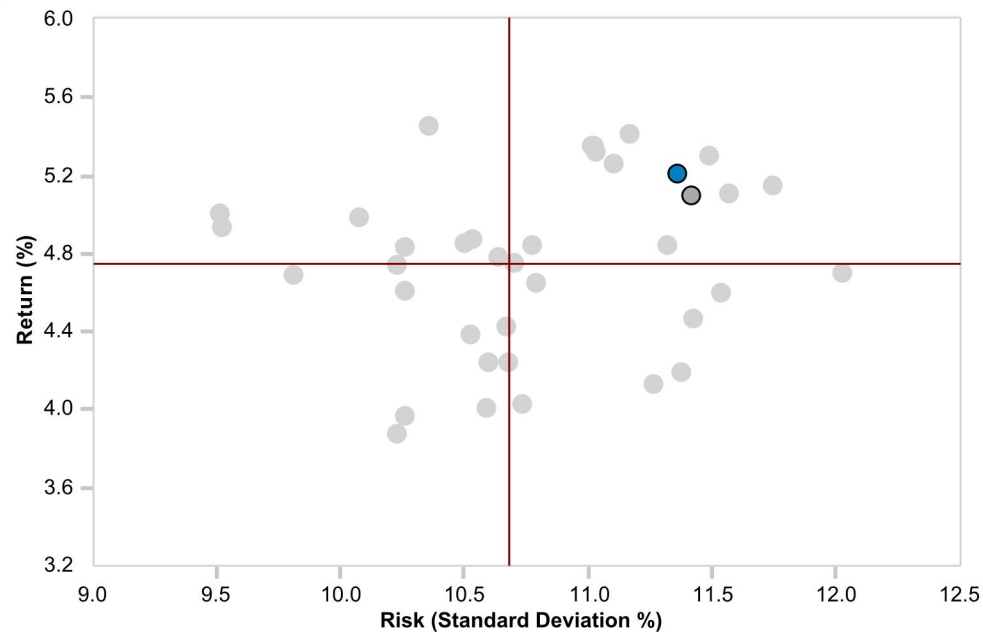
Fiscal Year Returns

	FYTD	FY 2019	FY 2018	FY 2017	FY 2016	FY 2015	FY 2014	FY 2013
Total Fund Composite	-8.66 (46)	3.27 (74)	9.67 (14)	12.55 (32)	11.20 (2)	-0.08 (24)	9.03 (66)	13.66 (24)
Total Fund Policy	-8.02 (25)	4.32 (54)	9.61 (14)	13.17 (26)	11.60 (2)	-1.35 (56)	11.09 (21)	13.56 (25)
Median	-8.99	4.40	7.53	11.77	9.67	-1.30	9.92	12.45

5 Year Rolling Percentile Ranking

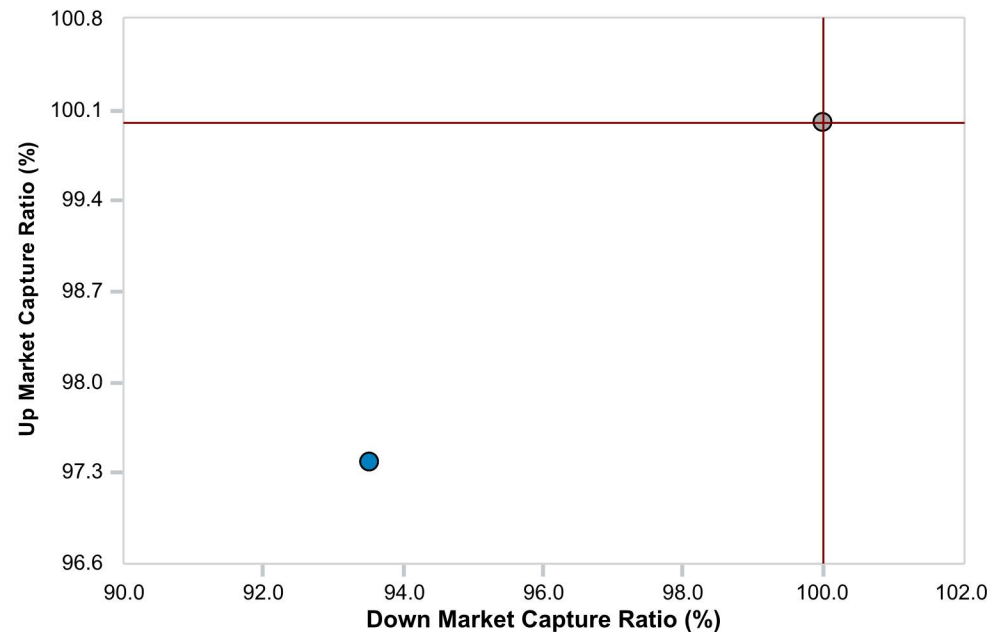


Risk vs Return: October 2007 to Present



● Total Fund Composite ● Total Fund Policy

Up/Down Markets: October 2007 to Present



● Total Fund Composite ● Total Fund Policy

Historical Statistics: October 1, 2007 To March 31, 2020

	Consistency	Maximum Drawdown	Alpha	Active Return	Sharpe Ratio	Information Ratio	Treynor Ratio	Beta	Tracking Error
Total Fund Composite	46.00	-27.75	0.20	0.10	0.44	0.06	0.05	0.98	1.76
Total Fund Policy	0.00	-31.18	0.00	0.00	0.42	N/A	0.05	1.00	0.00

Multi Timeperiod Statistics

	1 Qtr Return		1 Quarter Ending Dec-2019 Return		1 Quarter Ending Sep-2019 Return		1 Quarter Ending Jun-2019 Return		3 YR Return		5 YR Return		3 YR Down Market Capture		5 YR Down Market Capture	
Total Fund (Gross)	-13.52	(48)	5.62	(33)	0.70	(62)	3.05	(70)	3.36	(24)	4.21	(9)	100.38	(50)	100.33	(55)
Total Fund Policy	-13.40	(46)	6.20	(12)	0.75	(57)	3.43	(29)	3.91	(14)	4.83	(2)	100.00		100.00	
All Public Plans-Total Fund Median	-13.57		5.21		0.83		3.27		2.89		3.35		100.17		103.79	
Total Fund (Net)	-13.54		5.62		0.65		3.02		3.22		4.00		100.72		101.32	
Total Fund Policy	-13.40		6.20		0.75		3.43		3.91		4.83		100.00		100.00	
Total Equity	-21.93		8.34		0.59		3.81		2.22		3.95		99.41		97.72	
Total Equity Policy	-21.41		9.08		0.51		3.90		2.77		4.43		100.00		100.00	
Domestic Equity	-21.98	(53)	7.98	(52)	1.04	(50)	3.79	(55)	2.71	(41)	4.79	(31)	100.94	(52)	99.97	(56)
Total Domestic Equity Policy	-20.90	(40)	9.10	(26)	1.16	(43)	4.10	(41)	4.00	(22)	5.77	(14)	100.00		100.00	
IM U.S. All Cap Core Equity (SA+CF+MF) Median	-21.66		8.07		1.02		3.89		1.92		3.40		101.50		103.45	
International Equity	-21.64	(20)	10.11	(17)	-1.59	(53)	3.87	(31)	0.63	(8)	1.12	(1)	94.43	(84)	100.75	(94)
Total International Equity Policy	-23.26	(33)	8.99	(53)	-1.70	(59)	3.22	(38)	-1.48	(20)	-0.17	(1)	100.00		100.00	
IM International Large Cap Core Equity (MF) Median	-24.46		9.05		-1.28		2.81		-3.55		-2.78		109.73		118.12	
Total Fixed Income	-0.56	(92)	0.63	(11)	0.65	(99)	1.92	(98)	2.43	(98)	2.50	(99)	20.62	(97)	18.49	(100)
Total Fixed Income Policy	0.65	(77)	0.77	(7)	1.08	(97)	2.64	(95)	3.52	(94)	2.90	(97)	100.00		100.00	
IM U.S. Broad Market Core Fixed Income (SA+CF) Median	1.94		0.22		2.32		3.12		4.73		3.45		118.58		123.01	
Total Domestic Fixed Income	0.31	(77)	0.39	(63)	1.42	(52)	2.01	(88)	3.07	(87)	2.63	(81)	36.61	(88)	82.00	(60)
Total Domestic Fixed Policy	2.49	(23)	0.47	(47)	1.38	(58)	2.39	(68)	3.87	(36)	2.82	(51)	100.00		100.00	
IM U.S. Intermediate Duration (SA+CF) Median	1.31		0.44		1.42		2.51		3.75		2.82		78.21		87.63	
Global Fixed Income	-6.15	(70)	1.87	(7)	-3.09	(100)	1.46	(98)	-1.16	(98)	0.90	(88)	84.57	(10)	32.88	(77)
Diversified Fixed Income Policy	-7.77	(87)	1.97	(7)	-0.13	(88)	3.61	(36)	1.56	(78)	2.79	(7)	100.00		100.00	
IM Global Fixed Income (MF) Median	-3.20		0.74		1.01		3.37		2.28		1.79		42.39		66.10	
Total Real Estate (Net)	0.34	(77)	1.25	(84)	1.59	(63)	1.26	(62)	6.71	(61)	N/A		N/A		N/A	
NCREIF Fund Index-Open End Diversified Core (EW)	0.90	(60)	1.53	(63)	1.39	(75)	1.34	(57)	7.04	(59)	8.74	(57)	N/A		N/A	
IM U.S. Open End Private Real Estate (SA+CF) Median	1.25		1.65		1.75		1.41		7.52		9.07		N/A		N/A	

Palm Springs General Employees' Pension Plan

Compliance Statistics

As of March 31, 2020

	1 Qtr Return		1 Quarter Ending Dec-2019 Return		1 Quarter Ending Sep-2019 Return		1 Quarter Ending Jun-2019 Return		3 YR Return		5 YR Return		3 YR Down Market Capture		5 YR Down Market Capture
Domestic Equity Strategies															
Anchor All Cap Value	-25.43	(26)	5.39	(91)	3.40	(9)	2.93	(75)	-1.19	(42)	2.23	(37)	89.81	(76)	92.31 (76)
Russell 3000 Value Index	-27.32	(40)	7.48	(57)	1.23	(43)	3.68	(57)	-2.67	(52)	1.62	(45)	100.00		100.00
IM U.S. All Cap Value Equity (SA+CF) Median	-28.94		7.78		0.99		3.97		-2.49		1.35		103.84		105.21
MFS Growth Fund R6 (MFEKX)	-11.75	(18)	8.55	(78)	1.14	(22)	6.58	(11)	N/A		N/A		N/A		N/A
Russell 1000 Growth Index	-14.10	(64)	10.62	(27)	1.49	(16)	4.64	(56)	11.32	(42)	10.36	(24)	100.00		100.00
IM U.S. Large Cap Growth Equity (MF) Median	-13.43		9.69		-0.01		4.76		10.65		9.07		96.69		99.35
Primecap Odyssey Growth (POGRX)	-23.77	(100)	12.84	(4)	-2.97	(93)	0.69	(100)	N/A		N/A		N/A		N/A
Russell 1000 Growth Index	-14.10	(64)	10.62	(27)	1.49	(16)	4.64	(56)	11.32	(42)	10.36	(24)	100.00		100.00
IM U.S. Large Cap Growth Equity (MF) Median	-13.43		9.69		-0.01		4.76		10.65		9.07		96.69		99.35
Vanguard Mid Cap Index (VIMAX)	-25.73	(27)	6.88	(50)	0.61	(61)	4.36	(42)	-0.27	(14)	N/A		95.97	(81)	N/A
Russell Midcap Index	-27.07	(37)	7.06	(43)	0.48	(65)	4.13	(52)	-0.81	(18)	1.85	(18)	100.00		100.00
IM U.S. Mid Cap Core Equity (MF) Median	-28.30		6.85		0.98		4.14		-3.64		-0.37		107.19		106.92
Vanguard Stock Index (VTSAX)	-20.89	(39)	9.01	(29)	1.11	(45)	4.10	(40)	3.99	(22)	N/A		99.74	(57)	N/A
Russell 3000 Index	-20.90	(40)	9.10	(27)	1.16	(42)	4.10	(40)	4.00	(21)	5.77	(13)	100.00		100.00
IM U.S. Multi-Cap Core Equity (MF) Median	-21.69		8.07		1.00		3.87		1.79		3.30		101.66		103.59
International Equity Strategies															
EuroPacific Growth (RERGX)	-22.43	(30)	10.11	(17)	-1.59	(53)	3.87	(31)	0.29	(8)	0.91	(1)	96.40	(83)	102.21 (86)
MSCI AC World ex USA	-23.26	(33)	8.99	(53)	-1.70	(59)	3.22	(38)	-1.48	(20)	-0.17	(1)	100.00		100.00
IM International Large Cap Core Equity (MF) Median	-24.46		9.05		-1.28		2.81		-3.55		-2.78		109.73		118.12
Domestic Fixed Income Strategies															
GHA Fixed Income	0.31	(77)	0.39	(63)	1.42	(52)	2.01	(88)	3.07	(87)	2.63	(81)	36.61	(88)	82.00 (60)
Bloomberg Barclays Intermed Aggregate Index	2.49	(23)	0.47	(47)	1.38	(58)	2.39	(68)	3.87	(36)	2.82	(51)	100.00		100.00
IM U.S. Intermediate Duration (SA+CF) Median	1.31		0.44		1.42		2.51		3.75		2.82		78.21		87.63
Global Fixed Income Strategies															
Templeton Global Total Return (FTTRX)	-6.15	(70)	1.87	(7)	-3.09	(100)	1.46	(98)	-1.16	(98)	0.90	(88)	84.57	(10)	32.88 (77)
Diversified Fixed Income Policy	-7.77	(87)	1.97	(7)	-0.13	(88)	3.61	(36)	1.56	(78)	2.79	(7)	100.00		100.00
IM Global Fixed Income (MF) Median	-3.20		0.74		1.01		3.37		2.28		1.79		42.39		66.10
Real Estate Strategies															
Principal Real Estate (Net)	0.34	(77)	1.25	(84)	1.59	(63)	1.26	(62)	6.71	(61)	N/A		N/A		N/A
NCREIF Fund Index-Open End Diversified Core (EW)	0.90	(60)	1.53	(63)	1.39	(75)	1.34	(57)	7.04	(59)	8.74	(57)	N/A		N/A
IM U.S. Open End Private Real Estate (SA+CF) Median	1.25		1.65		1.75		1.41		7.52		9.07		N/A		N/A



Palm Springs General Employees' Pension Plan

Fee Analysis

As of March 31, 2020

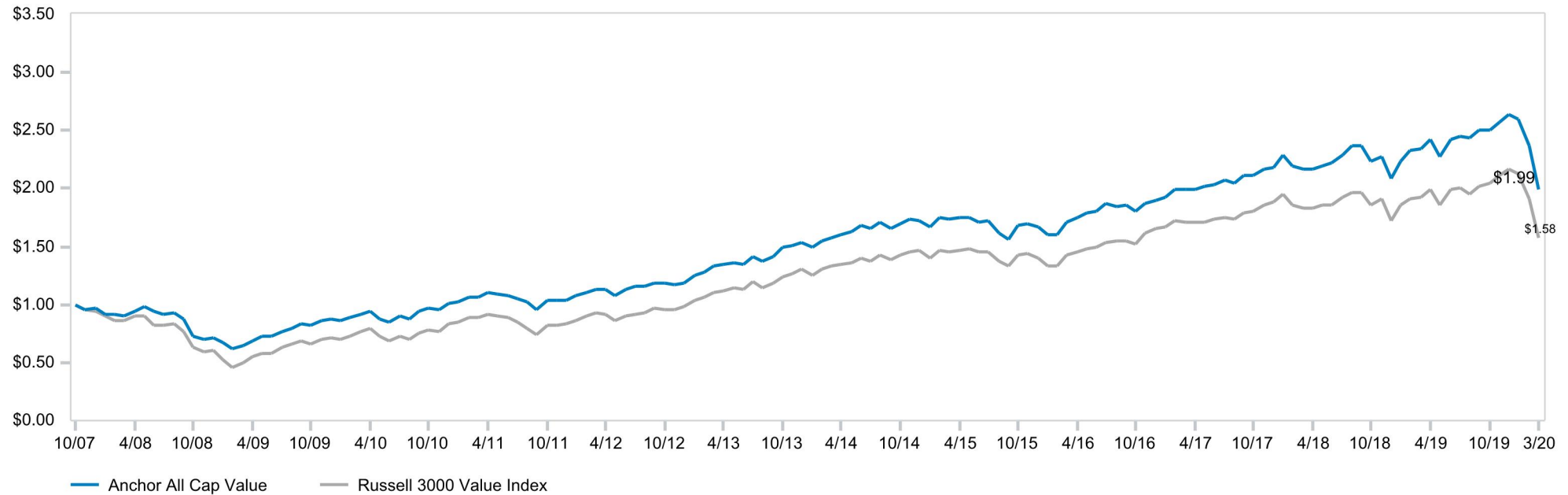
	Estimated Annual Fee (%)	03/31/20 Market Value	03/31/20 Allocation (%)	Estimated Annual Fee (\$)
Domestic Equity				
Anchor All Cap Value	0.60	2,634,122	10.70	15,805
MFS Growth Fund R6 (MFEKX)	0.60	1,588,249	6.45	9,529
Primecap Odyssey Growth (POGRX)	0.67	1,362,942	5.54	9,132
Vanguard Mid Cap Index (VIMAX)	0.08	2,633,557	10.70	2,107
Vanguard Stock Index (VTSAX)	0.04	2,883,903	11.71	1,154
International Equity				
EuroPacific Growth (RERGX)	0.49	2,079,860	8.45	10,191
Domestic Fixed Income				
GHA Fixed Income	0.25	7,091,940	28.81	17,730
Global Fixed Income				
Templeton Global Total Return (FTTRX)	0.66	1,033,913	4.20	6,824
Real Estate				
Principal Real Estate	1.10	2,628,440	10.68	28,913
Cash Accounts				
Mutual Fund Cash	0.00	682,742	2.77	-
Village		-	0.00	-
Total Fund Composite	0.41	24,619,667	100.00	101,384



Long-Term Manager Composite Data



Growth of a Dollar



Trailing Returns

	QTR	YTD	1 YR	2 YR	3 YR	5 YR	7 YR	10 YR	15 YR
Anchor All Cap Value	-24.62 (22)	-24.62 (22)	-15.16 (25)	-4.12 (21)	-0.07 (33)	2.80 (30)	5.91 (41)	8.00 (40)	7.36 (19)
Russell 3000 Value Index	-27.32 (40)	-27.32 (40)	-18.02 (49)	-7.09 (45)	-2.67 (52)	1.62 (45)	5.30 (51)	7.47 (56)	5.33 (75)
Median	-28.94	-28.94	-18.82	-8.21	-2.49	1.35	5.32	7.69	6.31

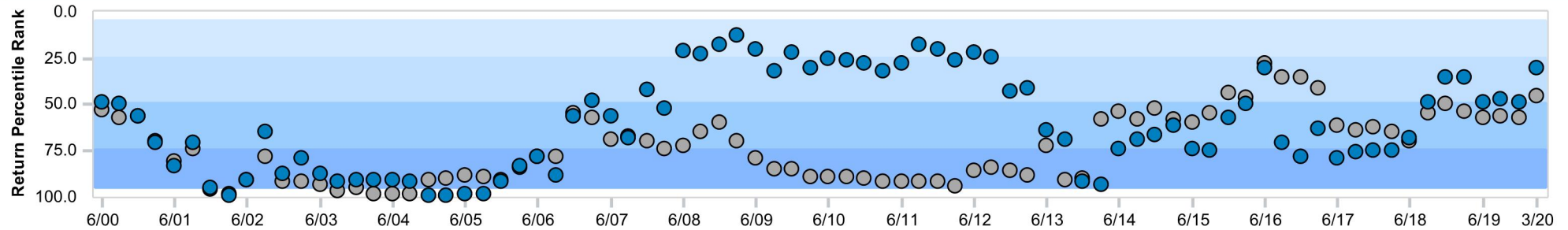
Fiscal Year Returns

	FYTD	FY 2019	FY 2018	FY 2017	FY 2016	FY 2015	FY 2014	FY 2013
Anchor All Cap Value	-20.42 (26)	5.64 (22)	12.18 (50)	13.37 (87)	18.64 (18)	-5.51 (77)	17.28 (29)	19.08 (94)
Russell 3000 Value Index	-21.89 (38)	3.10 (43)	9.46 (75)	15.53 (72)	16.38 (30)	-4.22 (66)	17.66 (25)	22.67 (73)
Median	-22.94	0.43	11.91	17.71	14.43	-2.86	15.29	26.41

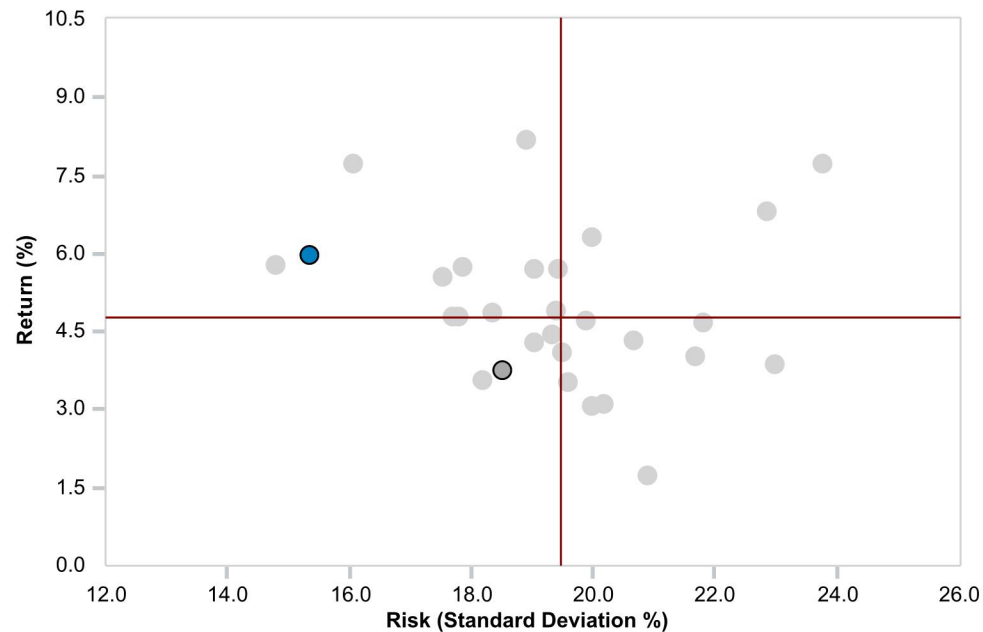
Long-term composite performance. Actual client results may vary.
October 2007 represents the beginning of the current market cycle.
Peer Group: IM U.S. All Cap Value Equity (SA+CF)



5 Year Rolling Percentile Ranking

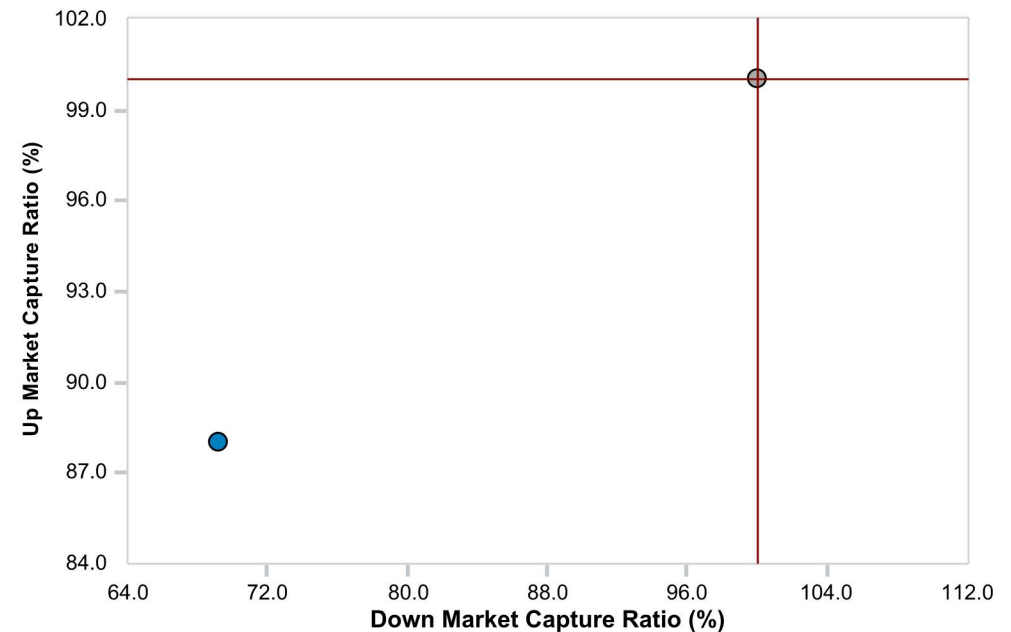


Risk vs Return: October 2007 to Present



● Anchor All Cap Value ● Russell 3000 Value Index

Up/Down Markets: October 2007 to Present



● Anchor All Cap Value ● Russell 3000 Value Index

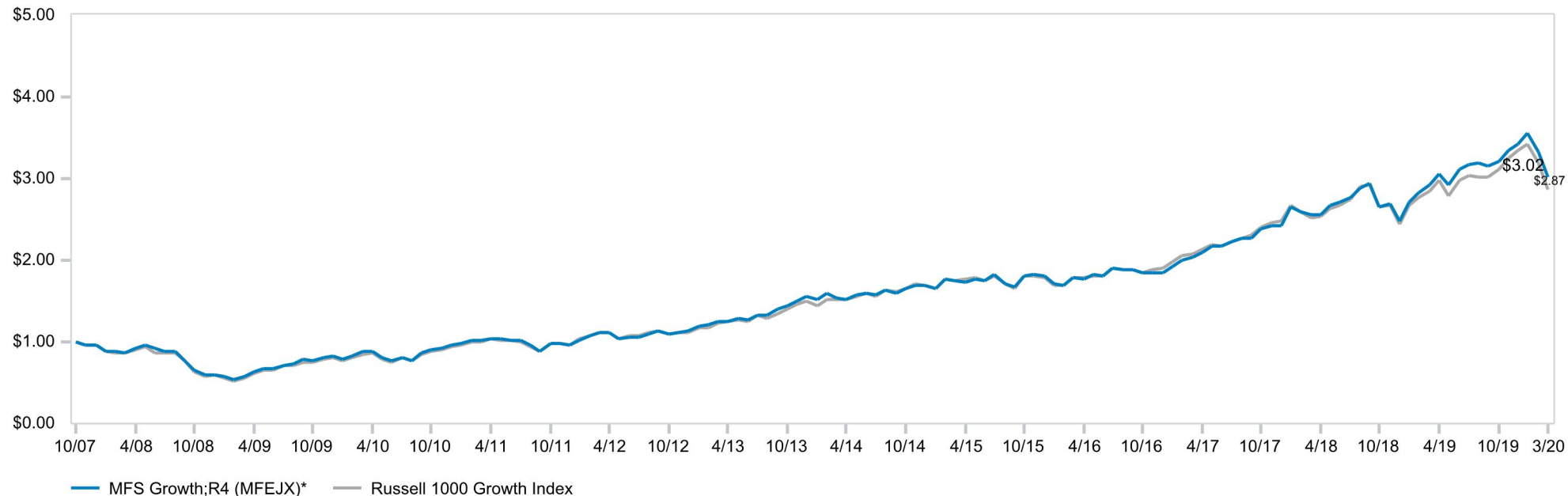
Historical Statistics: October 1, 2007 To March 31, 2020

	Consistency	Maximum Drawdown	Alpha	Active Return	Sharpe Ratio	Information Ratio	Treynor Ratio	Beta	Tracking Error
Anchor All Cap Value	60.00	-33.61	2.68	1.55	0.41	0.28	0.08	0.80	5.47
Russell 3000 Value Index	0.00	-50.22	0.00	0.00	0.25	N/A	0.05	1.00	0.00

Long-term composite performance. Actual client results may vary.
October 2007 represents the beginning of the current market cycle.
Peer Group: IM U.S. All Cap Value Equity (SA+CF)



Growth of a Dollar



Trailing Returns

	QTR	YTD	1 YR	2 YR	3 YR	5 YR	7 YR	10 YR	15 YR
MFS Growth;R4 (MFEJX)*	-11.78 (18)	-11.78 (18)	3.16 (6)	8.85 (9)	14.14 (7)	11.63 (5)	13.54 (15)	13.19 (12)	N/A
Russell 1000 Growth Index	-14.10 (64)	-14.10 (64)	0.91 (28)	6.67 (29)	11.32 (42)	10.36 (24)	12.93 (24)	12.97 (15)	9.69 (26)
Median	-13.43	-13.43	-0.82	5.37	10.65	9.07	11.86	11.66	8.78

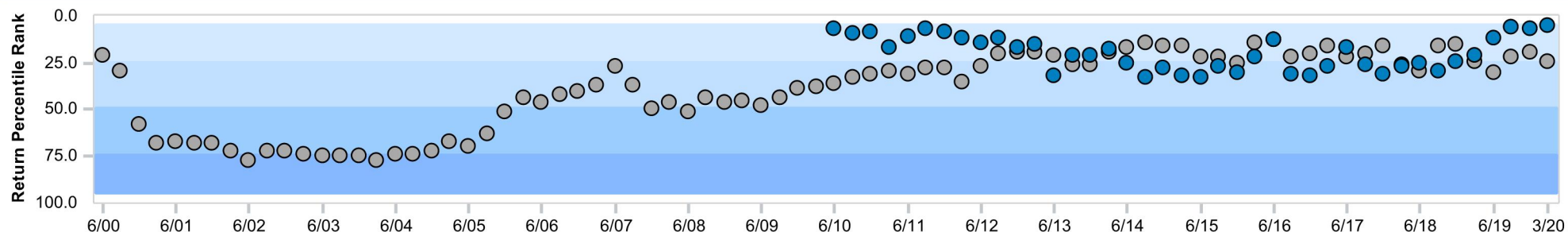
Fiscal Year Returns

	FYTD	FY 2019	FY 2018	FY 2017	FY 2016	FY 2015	FY 2014	FY 2013
MFS Growth;R4 (MFEJX)*	-4.25 (35)	7.45 (11)	28.96 (18)	20.75 (41)	13.12 (23)	3.96 (35)	14.81 (76)	23.16 (17)
Russell 1000 Growth Index	-4.98 (48)	3.71 (33)	26.30 (38)	21.94 (28)	13.76 (18)	3.17 (44)	19.15 (22)	19.27 (52)
Median	-5.12	2.32	25.06	20.13	10.96	2.84	16.89	19.37

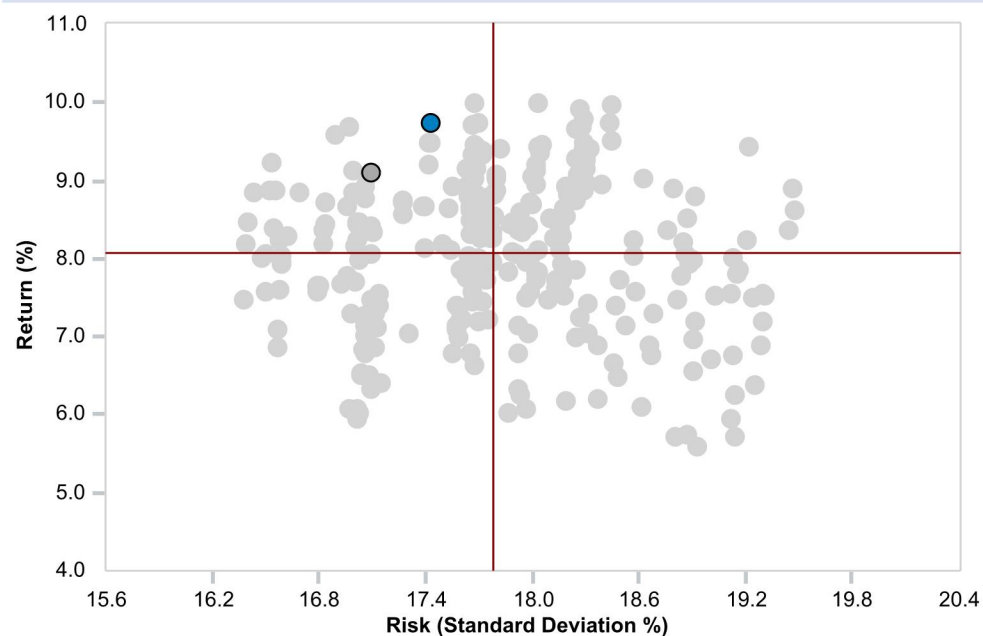
Long-term composite performance. Actual client results may vary.
October 2007 represents the beginning of the current market cycle.
Peer Group: IM U.S. Large Cap Growth Equity (MF)



5 Year Rolling Percentile Ranking

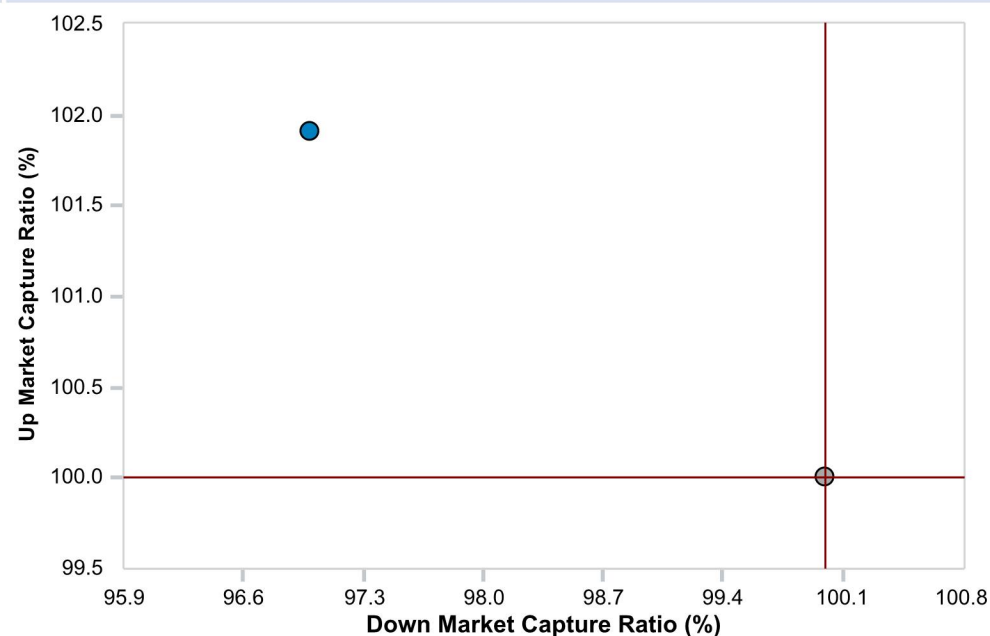


Risk vs Return: October 2007 to Present



● MFS Growth;R4 (MFEJX)* ● Russell 1000 Growth Index

Up/Down Markets: October 2007 to Present



● MFS Growth;R4 (MFEJX)* ● Russell 1000 Growth Index

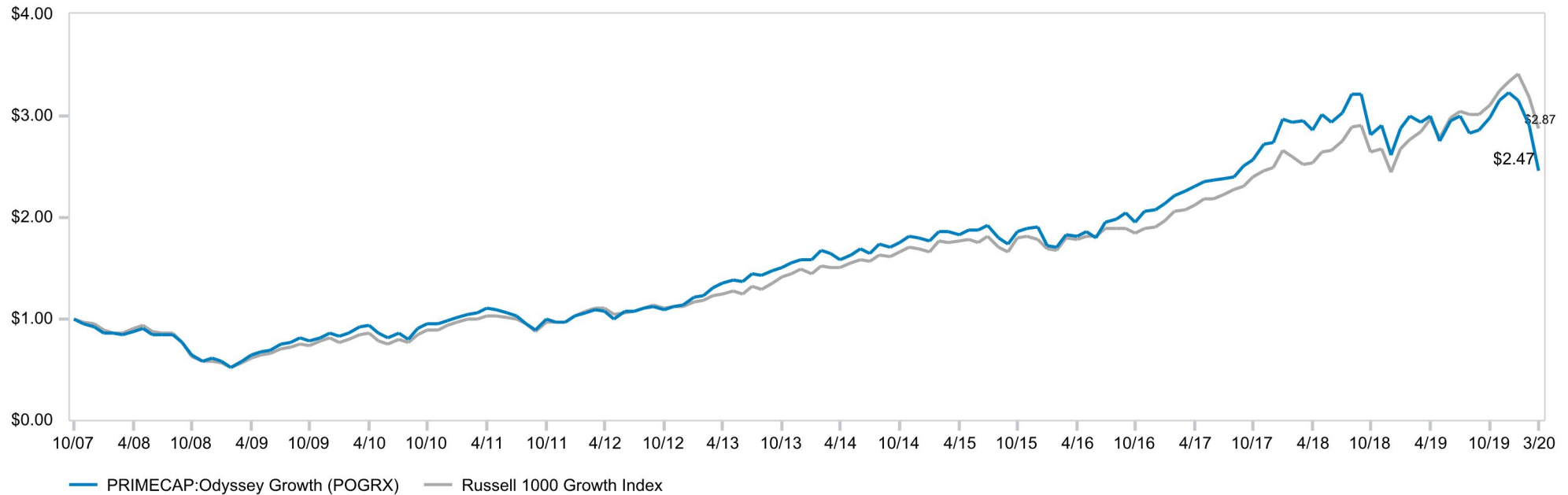
Historical Statistics: October 1, 2007 To March 31, 2020

	Consistency	Maximum Drawdown	Alpha	Active Return	Sharpe Ratio	Information Ratio	Treynor Ratio	Beta	Tracking Error
MFS Growth;R4 (MFEJX)*	56.00	-40.14	0.64	0.65	0.58	0.20	0.10	1.00	3.30
Russell 1000 Growth Index	0.00	-41.43	0.00	0.00	0.55	N/A	0.10	1.00	0.00

Long-term composite performance. Actual client results may vary.
October 2007 represents the beginning of the current market cycle.
Peer Group: IM U.S. Large Cap Growth Equity (MF)



Growth of a Dollar



Trailing Returns

	QTR	YTD	1 YR	2 YR	3 YR	5 YR	7 YR	10 YR	15 YR
PRIMECAP:Odyssey Growth (POGRX)	-23.77 (100)	-23.77 (100)	-15.97 (100)	-8.61 (100)	2.98 (100)	5.79 (97)	9.45 (92)	10.40 (84)	9.08 (41)
Russell 1000 Growth Index	-14.10 (64)	-14.10 (64)	0.91 (28)	6.67 (29)	11.32 (42)	10.36 (24)	12.93 (24)	12.97 (15)	9.69 (26)
Median	-13.43	-13.43	-0.82	5.37	10.65	9.07	11.86	11.66	8.78

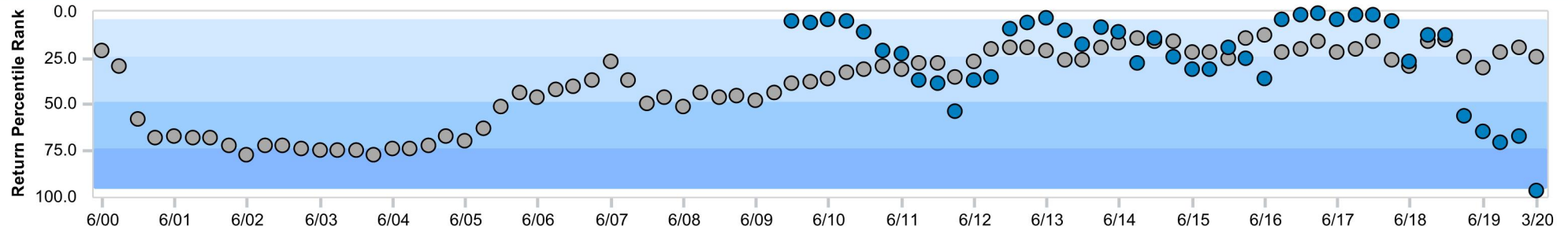
Fiscal Year Returns

	FYTD	FY 2019	FY 2018	FY 2017	FY 2016	FY 2015	FY 2014	FY 2013
PRIMECAP:Odyssey Growth (POGRX)	-13.99 (99)	-10.71 (100)	28.29 (24)	22.65 (21)	17.44 (2)	2.15 (60)	15.16 (74)	32.24 (1)
Russell 1000 Growth Index	-4.98 (48)	3.71 (33)	26.30 (38)	21.94 (28)	13.76 (18)	3.17 (44)	19.15 (22)	19.27 (52)
Median	-5.12	2.32	25.06	20.13	10.96	2.84	16.89	19.37

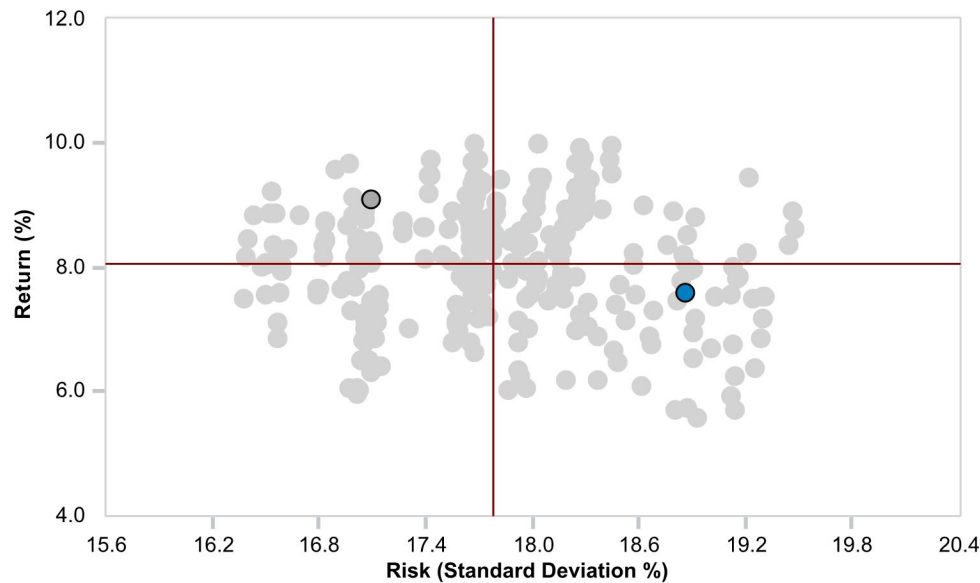
Long-term composite performance. Actual client results may vary.
 October 2007 represents the beginning of the current market cycle.
 Peer Group: IM U.S. Large Cap Growth Equity (MF)



5 Year Rolling Percentile Ranking

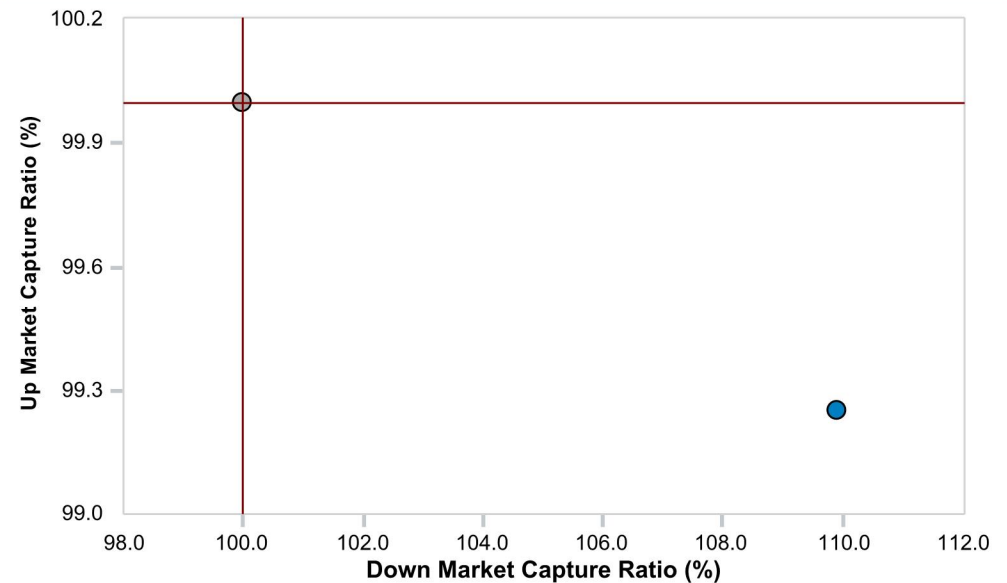


Risk vs Return: October 2007 to Present



- PRIMECAP:Odyssey Growth (POGRX)
- Russell 1000 Growth Index

Up/Down Markets: October 2007 to Present

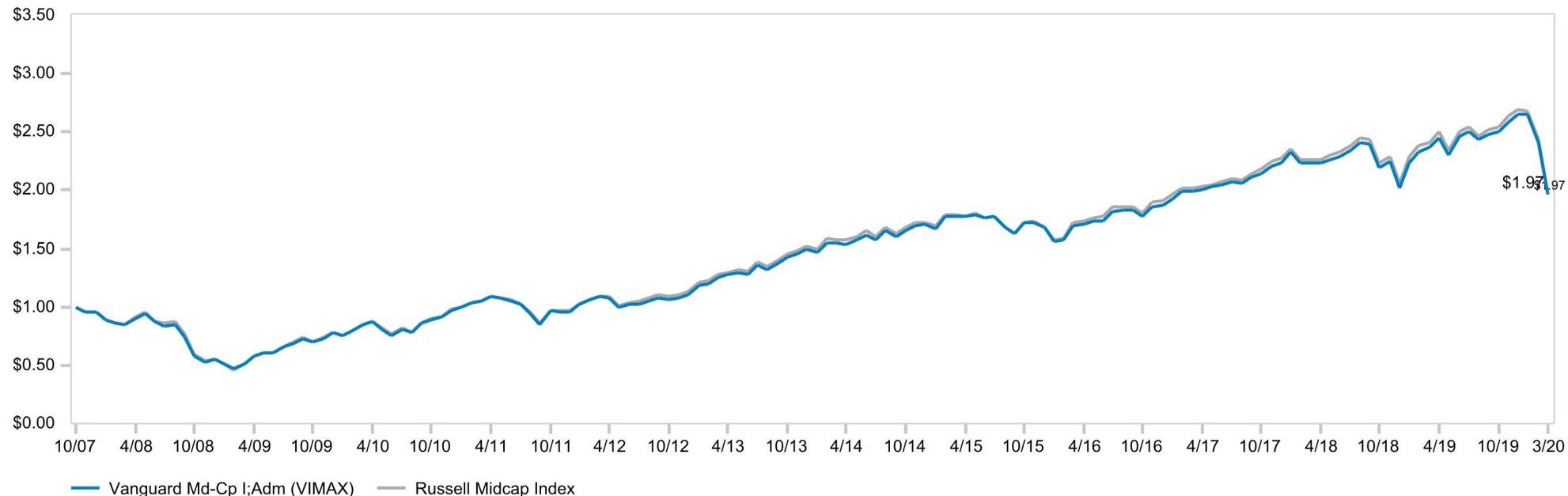


- PRIMECAP:Odyssey Growth (POGRX)
- Russell 1000 Growth Index

Historical Statistics: October 1, 2007 To March 31, 2020

	Consistency	Maximum Drawdown	Alpha	Active Return	Sharpe Ratio	Information Ratio	Treynor Ratio	Beta	Tracking Error
PRIMECAP:Odyssey Growth (POGRX)	50.00	-40.86	-1.40	-1.06	0.45	-0.16	0.08	1.03	6.68
Russell 1000 Growth Index	0.00	-41.43	0.00	0.00	0.55	N/A	0.10	1.00	0.00

Growth of a Dollar



Trailing Returns

	QTR	YTD	1 YR	2 YR	3 YR	5 YR	7 YR	10 YR	15 YR
Vanguard Md-Cp I;Adm (VIMAX)	-25.72 (26)	-25.72 (26)	-16.65 (21)	-6.01 (19)	-0.26 (14)	2.08 (14)	6.70 (10)	8.86 (8)	7.28 (8)
Russell Midcap Index	-27.07 (37)	-27.07 (37)	-18.31 (38)	-6.74 (24)	-0.81 (18)	1.85 (18)	6.35 (14)	8.77 (9)	7.22 (9)
Median	-28.30	-28.30	-19.67	-9.31	-3.64	-0.37	3.86	6.32	5.50

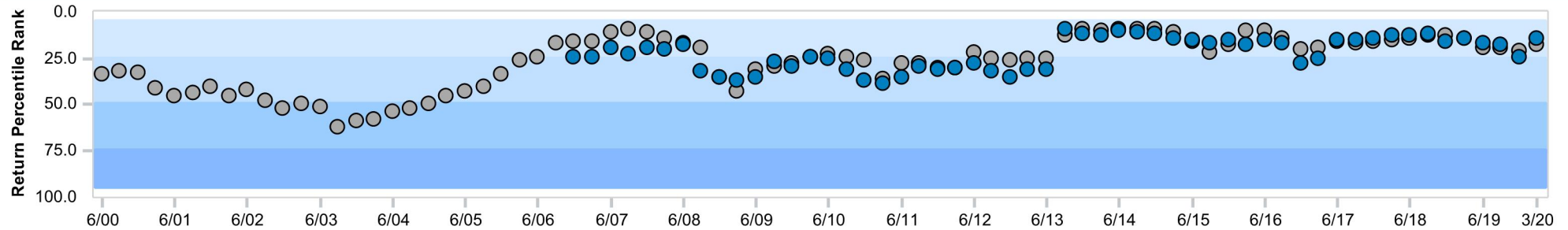
Fiscal Year Returns

	FYTD	FY 2019	FY 2018	FY 2017	FY 2016	FY 2015	FY 2014	FY 2013
Vanguard Md-Cp I;Adm (VIMAX)	-20.61 (24)	3.65 (24)	13.42 (30)	15.30 (49)	12.64 (40)	1.71 (24)	15.88 (14)	27.95 (43)
Russell Midcap Index	-21.92 (39)	3.19 (27)	13.98 (25)	15.32 (47)	14.25 (25)	-0.25 (34)	15.83 (16)	27.91 (44)
Median	-23.24	1.09	10.84	15.23	11.87	-1.05	12.32	27.52

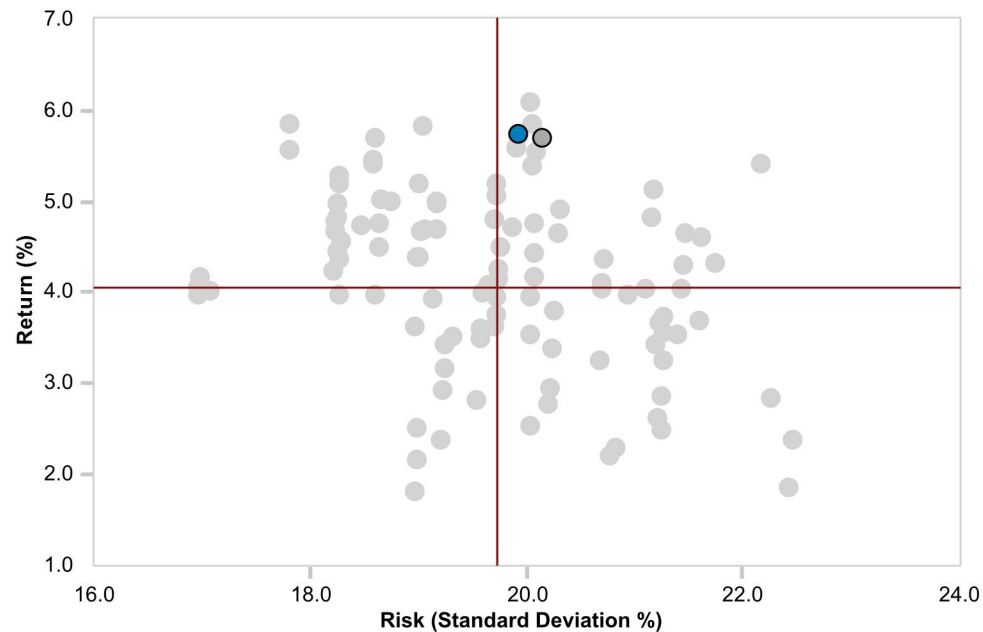
Long-term composite performance. Actual client results may vary.
October 2007 represents the beginning of the current market cycle.
Peer Group: IM U.S. Mid Cap Core Equity (MF)



5 Year Rolling Percentile Ranking

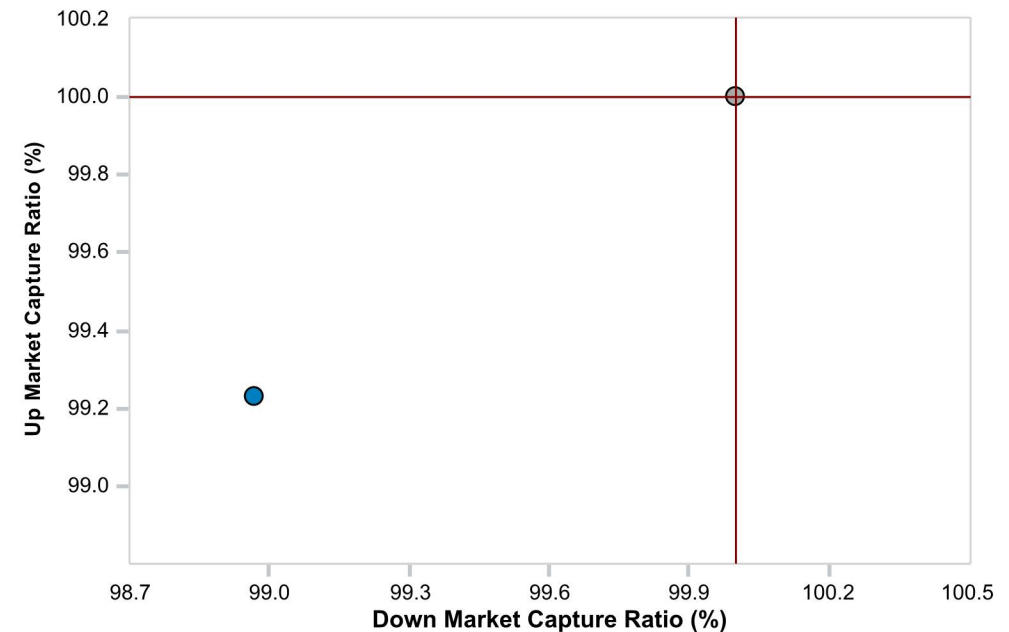


Risk vs Return: October 2007 to Present



● Vanguard Md-Cp I;Adm (VIMAX) ● Russell Midcap Index

Up/Down Markets: October 2007 to Present

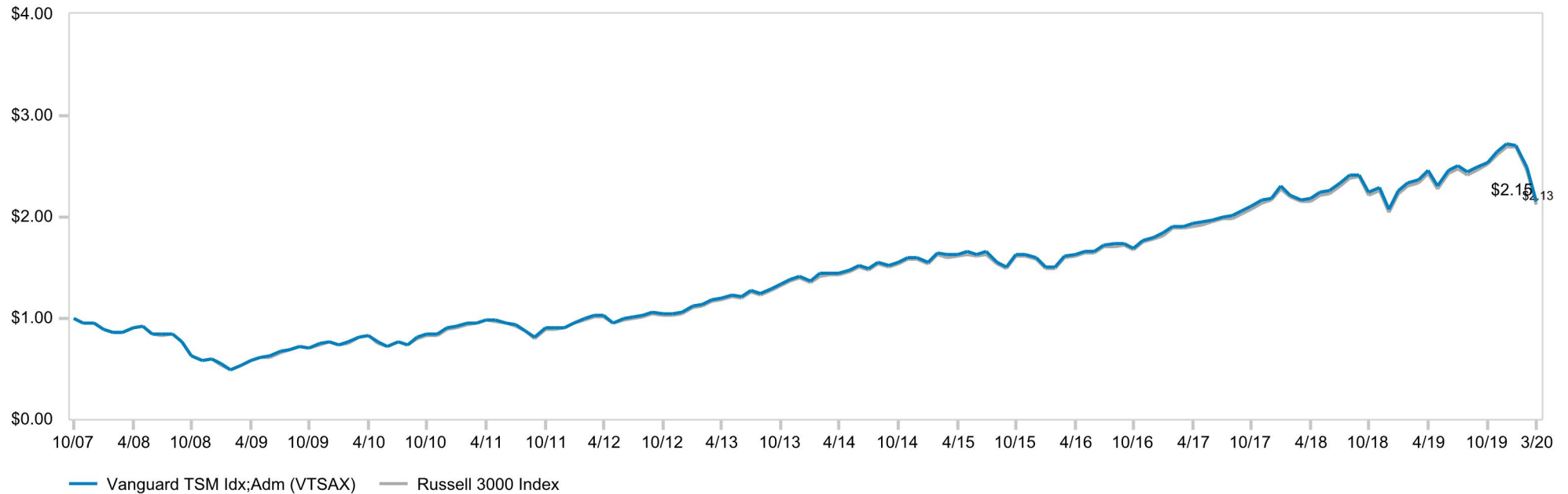


● Vanguard Md-Cp I;Adm (VIMAX) ● Russell Midcap Index

Historical Statistics: October 1, 2007 To March 31, 2020

	Consistency	Maximum Drawdown	Alpha	Active Return	Sharpe Ratio	Information Ratio	Treynor Ratio	Beta	Tracking Error
Vanguard Md-Cp I;Adm (VIMAX)	48.00	-48.50	0.07	-0.03	0.35	-0.02	0.07	0.99	1.46
Russell Midcap Index	0.00	-48.60	0.00	0.00	0.34	N/A	0.07	1.00	0.00

Growth of a Dollar



Trailing Returns

	QTR	YTD	1 YR	2 YR	3 YR	5 YR	7 YR	10 YR	15 YR
Vanguard TSM Idx;Adm (VTSAX)	-20.87 (39)	-20.87 (39)	-9.24 (32)	-0.63 (23)	3.98 (22)	5.73 (15)	8.94 (13)	10.15 (10)	7.61 (14)
Russell 3000 Index	-20.90 (40)	-20.90 (40)	-9.13 (30)	-0.58 (21)	4.00 (21)	5.77 (13)	8.96 (13)	10.15 (10)	7.50 (16)
Median	-21.69	-21.69	-11.73	-3.56	1.79	3.30	6.99	8.29	6.20

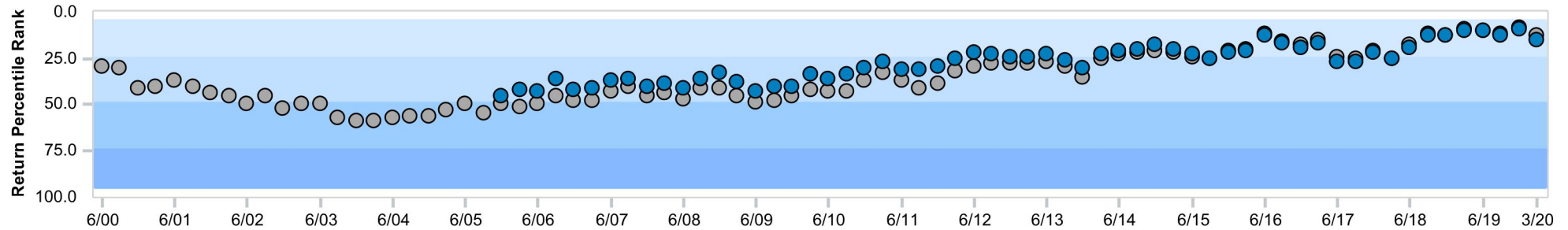
Fiscal Year Returns

	FYTD	FY 2019	FY 2018	FY 2017	FY 2016	FY 2015	FY 2014	FY 2013
Vanguard TSM Idx;Adm (VTSAX)	-13.74 (30)	2.88 (38)	17.62 (18)	18.63 (38)	14.98 (16)	-0.58 (35)	17.76 (32)	21.49 (61)
Russell 3000 Index	-13.70 (29)	2.92 (37)	17.58 (19)	18.71 (36)	14.96 (17)	-0.49 (33)	17.76 (32)	21.60 (59)
Median	-16.07	1.47	14.71	17.56	11.62	-1.81	16.35	22.62

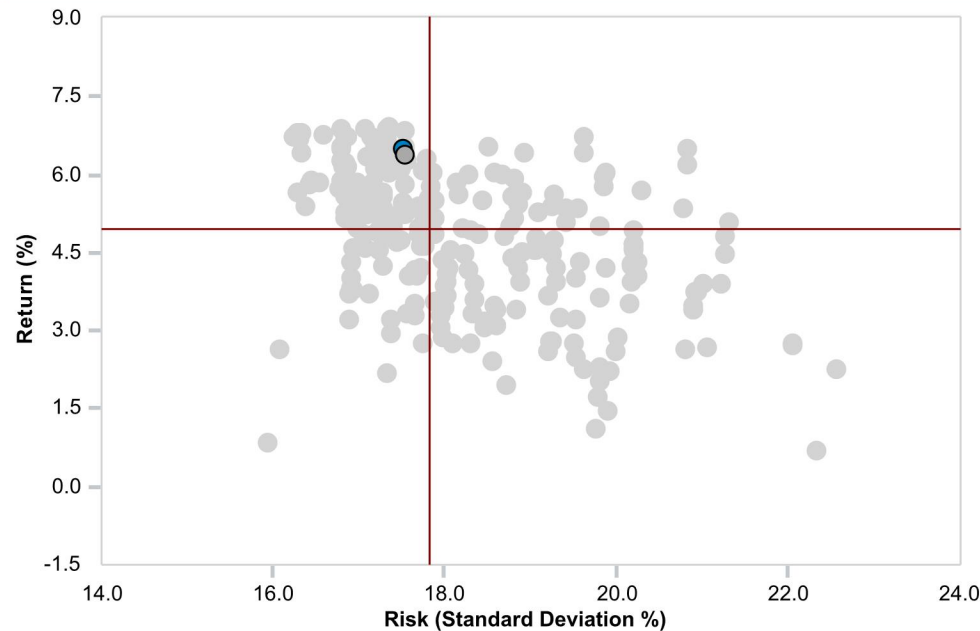
Long-term composite performance. Actual client results may vary.
October 2007 represents the beginning of the current market cycle.
Peer Group: IM U.S. Multi-Cap Core Equity (MF)



5 Year Rolling Percentile Ranking

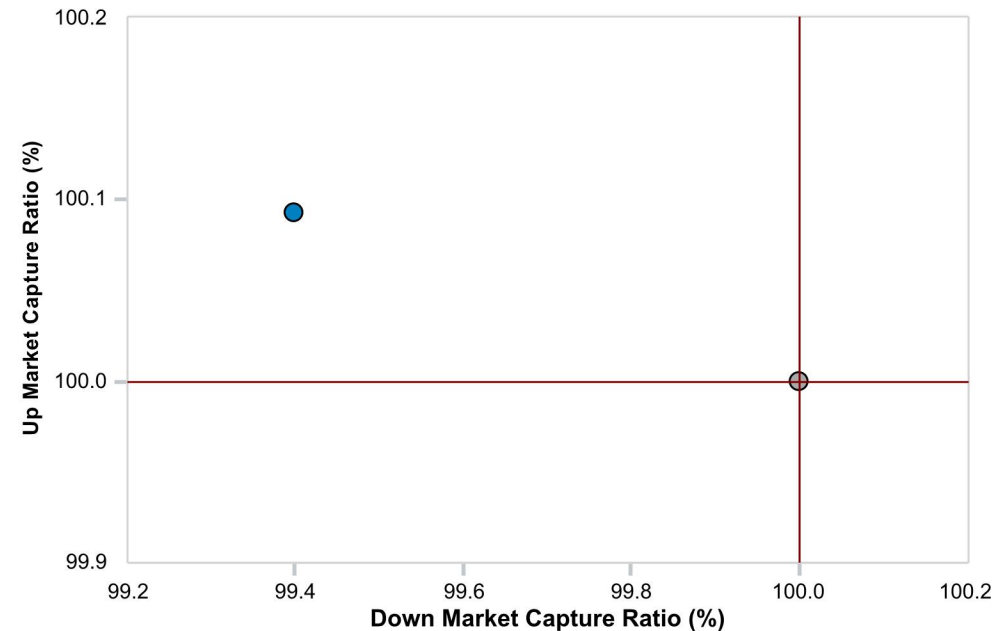


Risk vs Return: October 2007 to Present



● Vanguard TSM Idx;Adm (VTSAX) ● Russell 3000 Index

Up/Down Markets: October 2007 to Present



● Vanguard TSM Idx;Adm (VTSAX) ● Russell 3000 Index

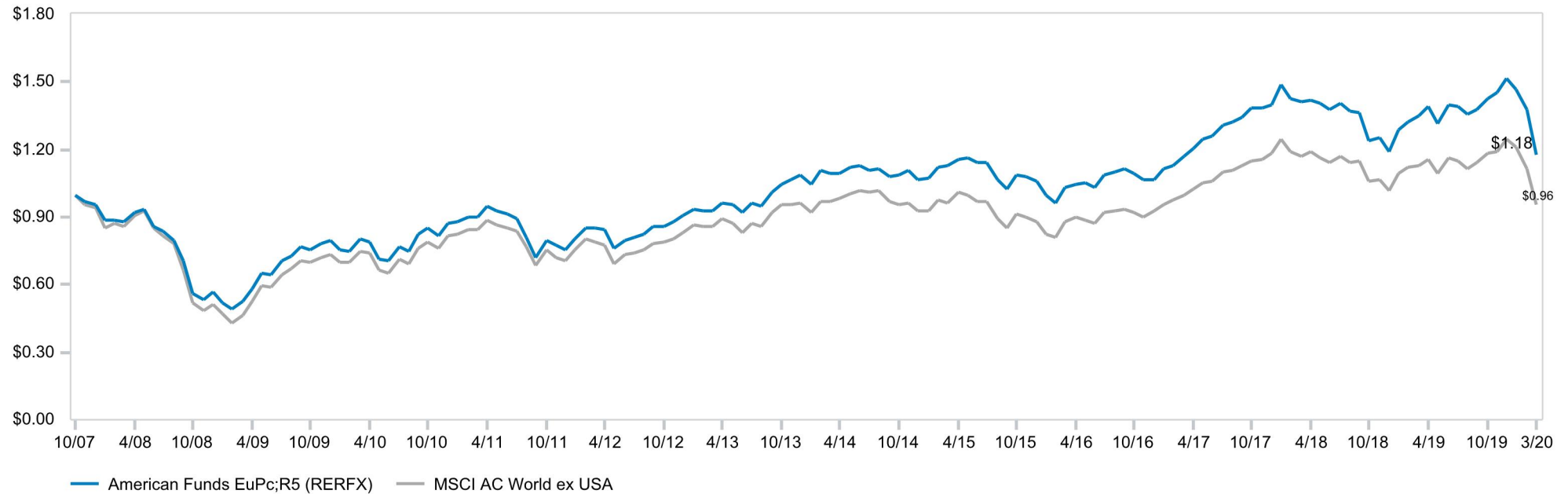
Historical Statistics: October 1, 2007 To March 31, 2020

	Consistency	Maximum Drawdown	Alpha	Active Return	Sharpe Ratio	Information Ratio	Treynor Ratio	Beta	Tracking Error
Vanguard TSM Idx;Adm (VTSAX)	54.00	-45.58	0.09	0.08	0.40	0.58	0.07	1.00	0.14
Russell 3000 Index	0.00	-45.95	0.00	0.00	0.40	N/A	0.07	1.00	0.00

Long-term composite performance. Actual client results may vary.
October 2007 represents the beginning of the current market cycle.
Peer Group: IM U.S. Multi-Cap Core Equity (MF)



Growth of a Dollar



Trailing Returns

	QTR	YTD	1 YR	2 YR	3 YR	5 YR	7 YR	10 YR	15 YR
American Funds EuPc;R5 (RERFX)	-22.46 (80)	-22.46 (80)	-12.76 (68)	-8.82 (64)	0.23 (49)	0.86 (37)	3.41 (22)	3.92 (32)	5.32 (8)
MSCI AC World ex USA	-23.26 (88)	-23.26 (88)	-15.14 (91)	-9.62 (76)	-1.48 (78)	-0.17 (57)	1.53 (71)	2.52 (69)	3.86 (62)
Median	-20.57	-20.57	-10.29	-7.37	0.15	0.06	2.21	3.08	4.28

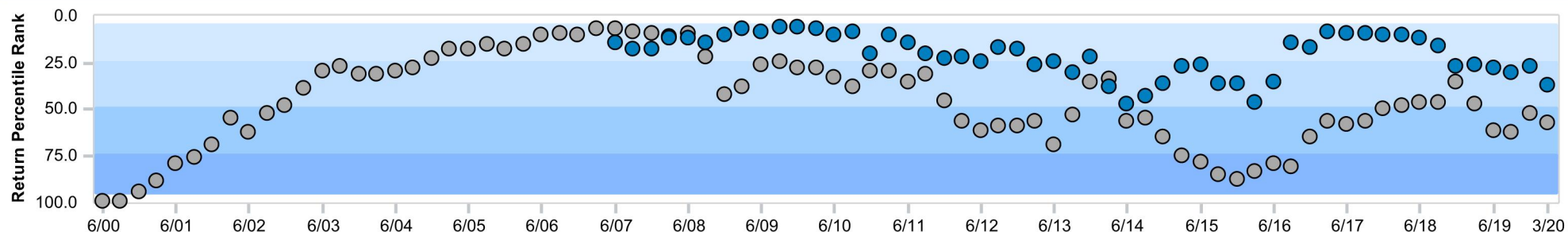
Fiscal Year Returns

	FYTD	FY 2019	FY 2018	FY 2017	FY 2016	FY 2015	FY 2014	FY 2013
American Funds EuPc;R5 (RERFX)	-14.64 (58)	1.10 (45)	1.44 (60)	20.56 (10)	8.47 (39)	-4.97 (35)	6.93 (3)	18.22 (46)
MSCI AC World ex USA	-16.37 (87)	-0.72 (67)	2.25 (51)	20.15 (19)	9.80 (27)	-11.78 (89)	5.22 (29)	16.98 (58)
Median	-13.98	0.81	2.28	17.85	7.77	-5.68	4.23	17.85

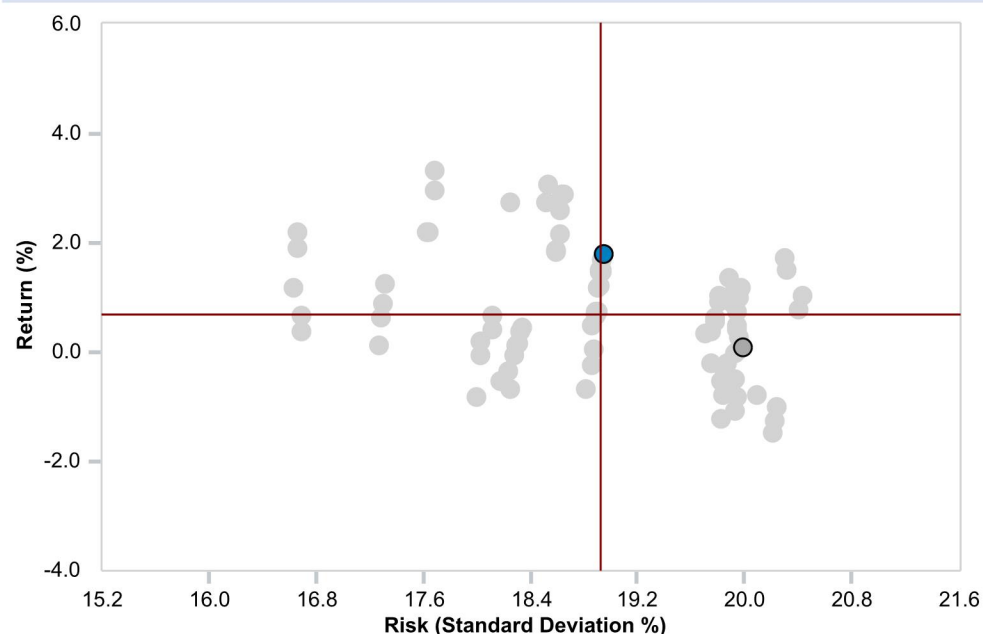
Long-term composite performance. Actual client results may vary.
October 2007 represents the beginning of the current market cycle.
Peer Group: IM International Large Cap Growth Equity (MF)



5 Year Rolling Percentile Ranking

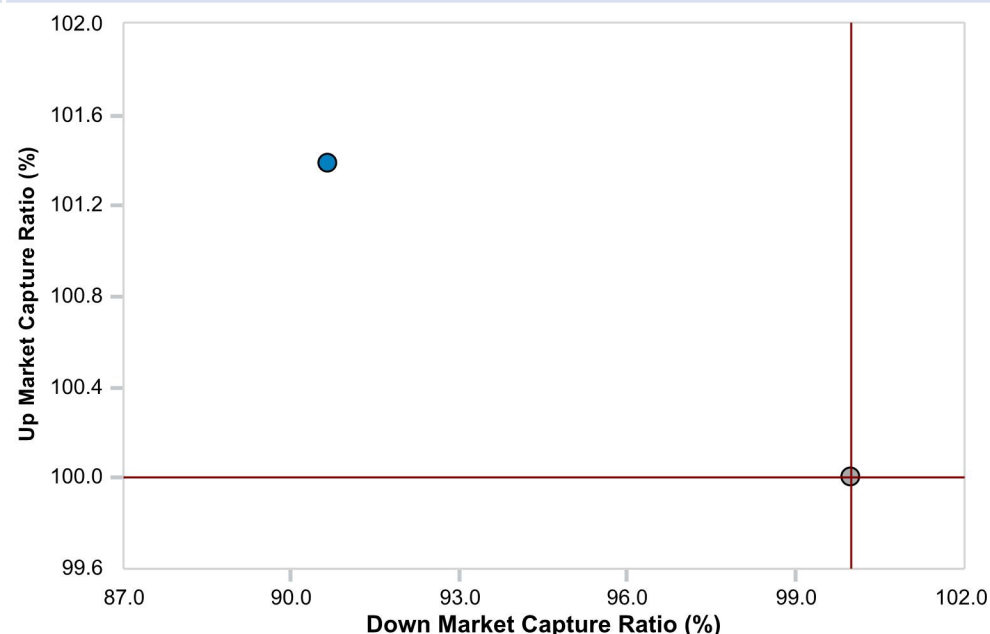


Risk vs Return: October 2007 to Present



● American Funds EuPc;R5 (RERFX) ● MSCI AC World ex USA

Up/Down Markets: October 2007 to Present



● American Funds EuPc;R5 (RERFX) ● MSCI AC World ex USA

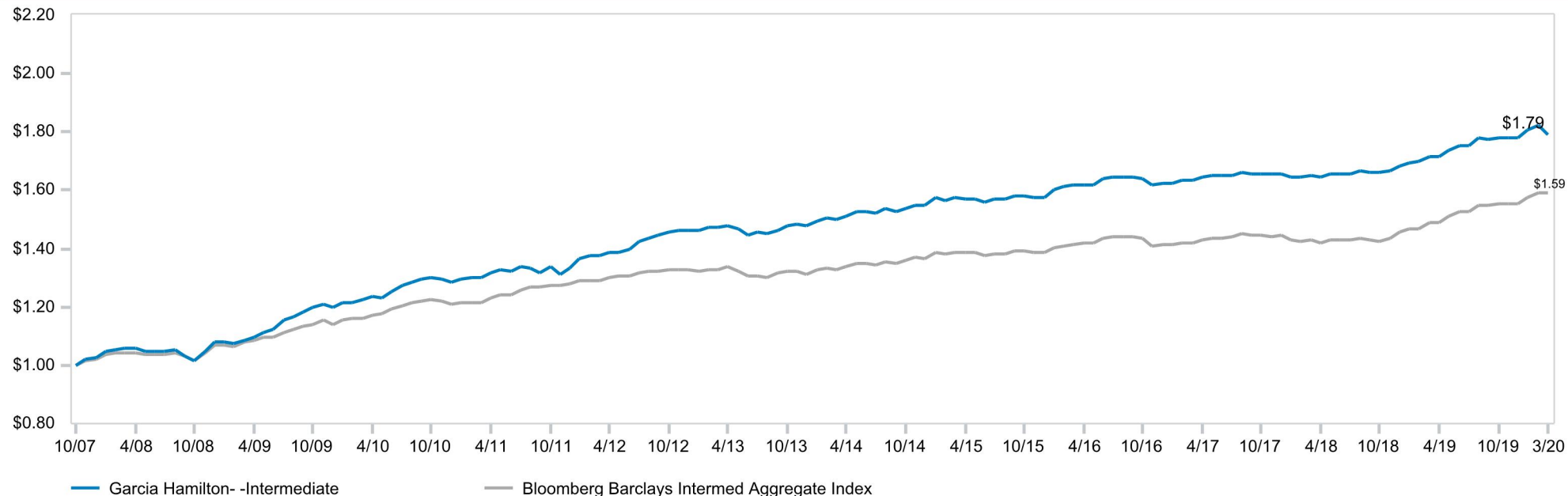
Historical Statistics: October 1, 2007 To March 31, 2020

	Consistency	Maximum Drawdown	Alpha	Active Return	Sharpe Ratio	Information Ratio	Treynor Ratio	Beta	Tracking Error
American Funds EuPc;R5 (RERFX)	62.00	-45.07	1.64	1.49	0.15	0.44	0.03	0.93	3.40
MSCI AC World ex USA	0.00	-51.36	0.00	0.00	0.07	N/A	0.01	1.00	0.00

Long-term composite performance. Actual client results may vary.
October 2007 represents the beginning of the current market cycle.
Peer Group: IM International Large Cap Growth Equity (MF)



Growth of a Dollar



Trailing Returns

	QTR	YTD	1 YR	2 YR	3 YR	5 YR	7 YR	10 YR	15 YR
Garcia Hamilton- -Intermediate	0.47 (70)	0.47 (70)	4.43 (80)	4.17 (87)	3.09 (85)	2.60 (83)	2.83 (27)	3.88 (13)	4.82 (7)
Bloomberg Barclays Intermed Aggregate Index	2.49 (23)	2.49 (23)	6.88 (22)	5.60 (26)	3.87 (36)	2.82 (51)	2.62 (52)	3.22 (71)	3.96 (77)
Median	1.31	1.31	5.94	5.17	3.75	2.82	2.62	3.38	4.16

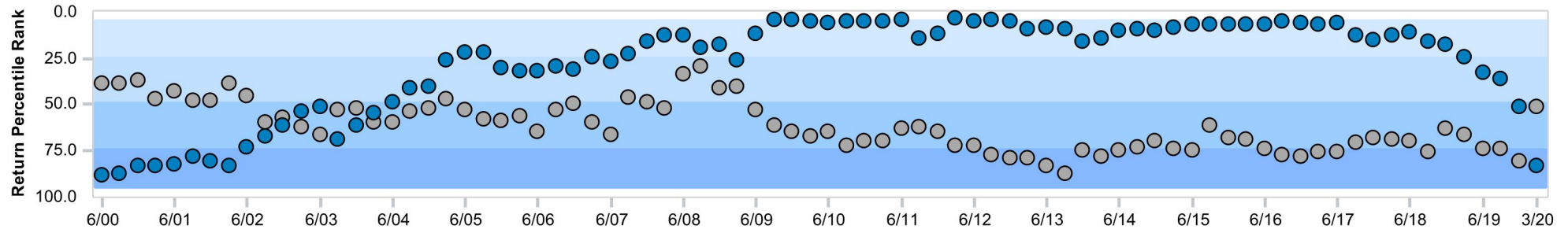
Fiscal Year Returns

	FYTD	FY 2019	FY 2018	FY 2017	FY 2016	FY 2015	FY 2014	FY 2013
Garcia Hamilton- -Intermediate	0.79 (78)	7.06 (84)	0.19 (20)	0.57 (62)	4.01 (42)	3.60 (6)	4.67 (10)	0.85 (9)
Bloomberg Barclays Intermed Aggregate Index	2.96 (19)	8.08 (45)	-0.93 (95)	0.25 (86)	3.57 (73)	2.95 (31)	2.74 (58)	-0.71 (77)
Median	1.81	8.01	-0.39	0.69	3.90	2.70	2.88	-0.27

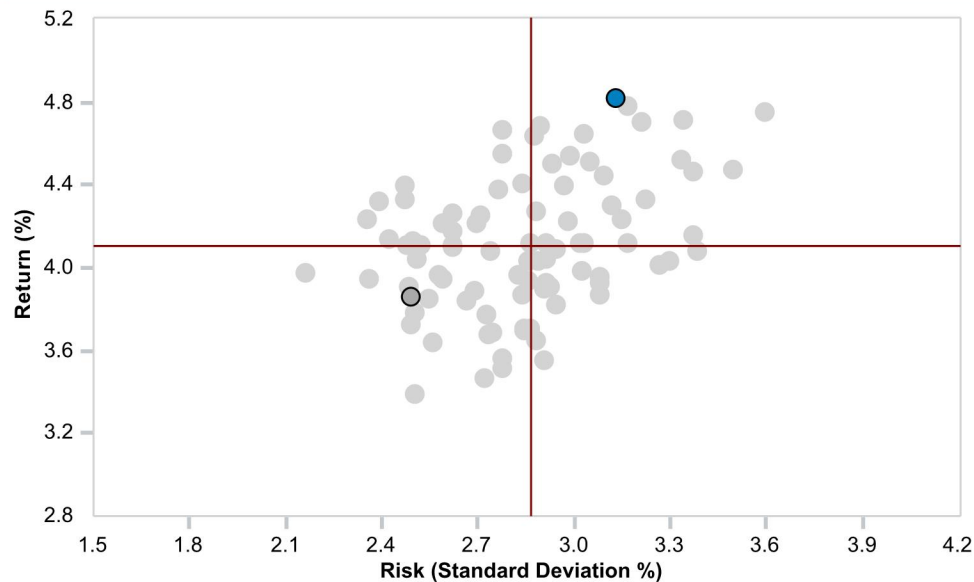
Long-term composite performance. Actual client results may vary.
October 2007 represents the beginning of the current market cycle.
Peer Group: IM U.S. Intermediate Duration (SA+CF)



5 Year Rolling Percentile Ranking

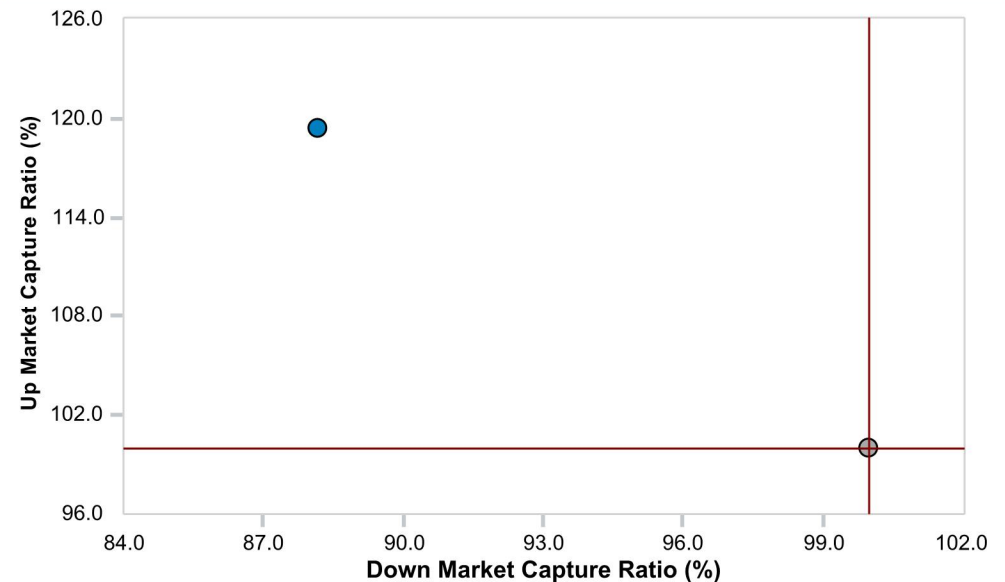


Risk vs Return: October 2007 to Present



- Garcia Hamilton- -Intermediate
- Bloomberg Barclays Intermed Aggregate Index

Up/Down Markets: October 2007 to Present

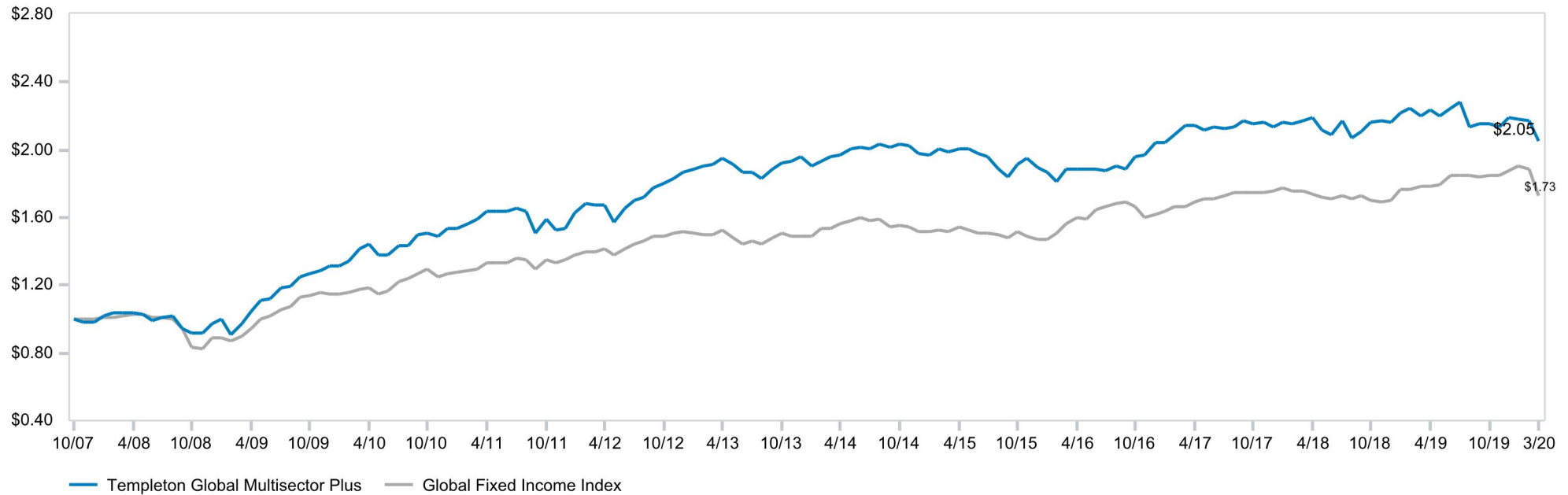


- Garcia Hamilton- -Intermediate
- Bloomberg Barclays Intermed Aggregate Index

Historical Statistics: October 1, 2007 To March 31, 2020

	Consistency	Maximum Drawdown	Alpha	Active Return	Sharpe Ratio	Information Ratio	Treynor Ratio	Beta	Tracking Error
Garcia Hamilton- -Intermediate	68.00	-2.40	0.92	0.95	1.28	0.50	0.04	1.01	1.87
Bloomberg Barclays Intermed Aggregate Index	0.00	-2.05	0.00	0.00	1.27	N/A	0.03	1.00	0.00

Growth of a Dollar



Trailing Returns

	QTR	YTD	1 YR	2 YR	3 YR	5 YR	7 YR	10 YR	15 YR
Templeton Global Multisector Plus	-6.54 (60)	-6.54 (60)	-6.95 (93)	-2.92 (81)	-1.49 (98)	0.66 (83)	1.01 (84)	3.81 (27)	7.05 (1)
Global Fixed Income Index	-8.14 (76)	-8.14 (76)	-3.24 (73)	-0.95 (72)	1.29 (73)	2.65 (42)	2.10 (41)	3.95 (24)	5.10 (15)
Median	-5.80	-5.80	0.91	0.88	2.61	2.49	1.88	3.14	4.03

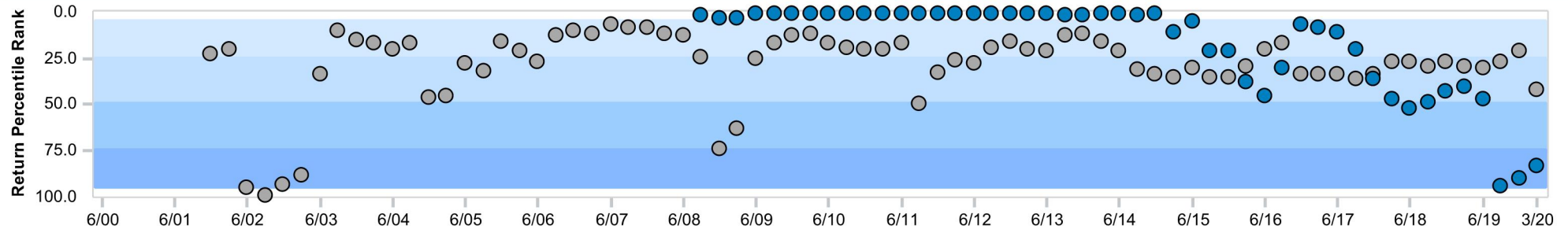
Fiscal Year Returns

	FYTD	FY 2019	FY 2018	FY 2017	FY 2016	FY 2015	FY 2014	FY 2013
Templeton Global Multisector Plus	-4.63 (60)	2.11 (93)	-2.92 (93)	15.27 (1)	2.07 (97)	-8.32 (97)	6.56 (25)	6.45 (6)
Global Fixed Income Index	-6.21 (79)	6.74 (61)	-1.21 (55)	3.07 (52)	14.24 (2)	-3.96 (70)	4.70 (45)	-0.84 (57)
Median	-3.97	7.81	-1.05	3.50	8.40	-3.03	4.38	-0.28

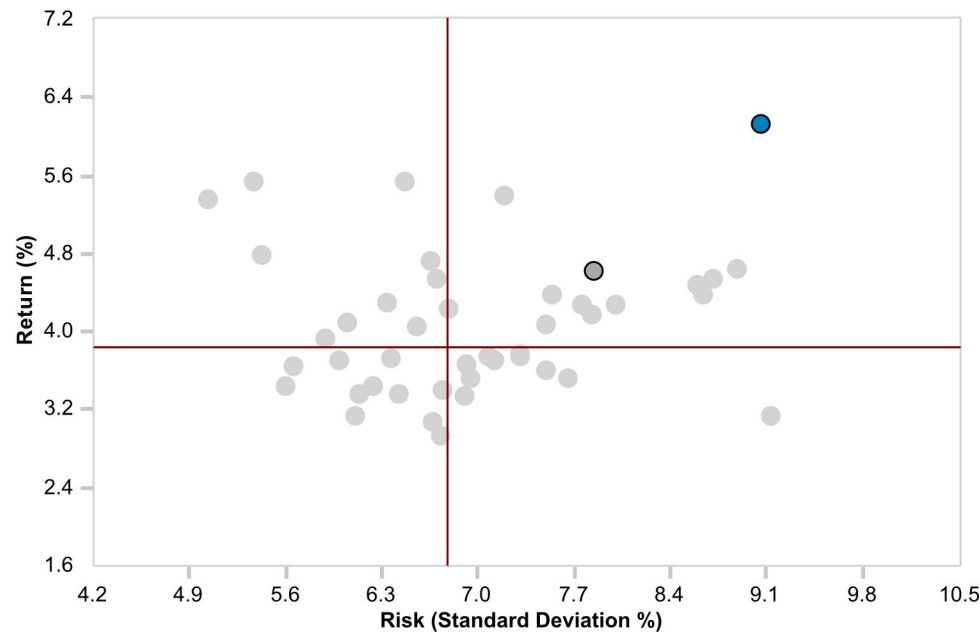
Long-term composite performance. Actual client results may vary.
October 2007 represents the beginning of the current market cycle.
Peer Group: IM Global Unhedged Fixed Income (SA+CF)



5 Year Rolling Percentile Ranking

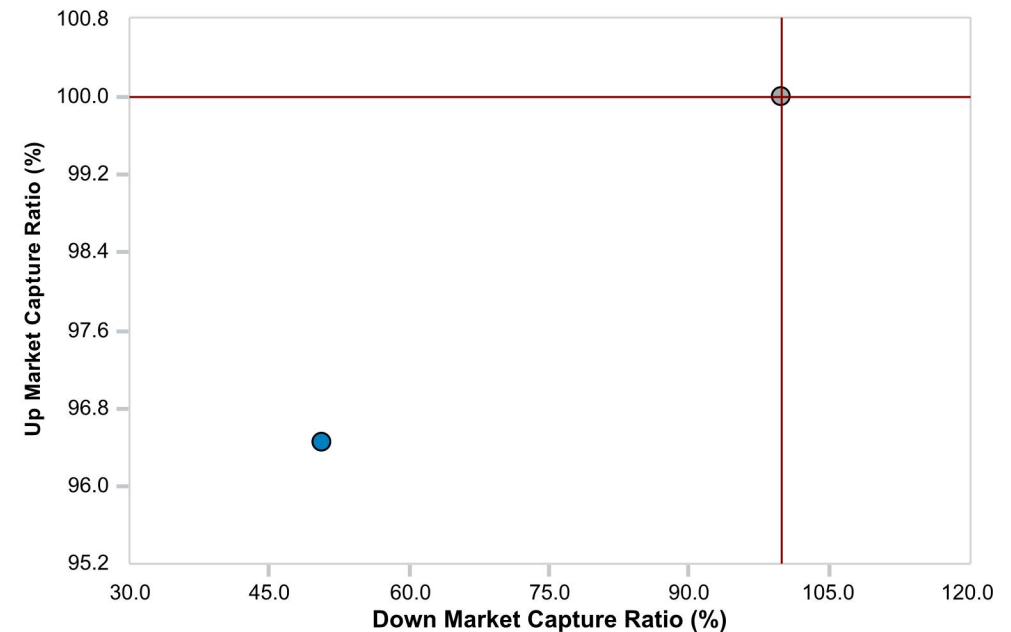


Risk vs Return: October 2007 to Present



● Templeton Global Multisector Plus ● Global Fixed Income Index

Up/Down Markets: October 2007 to Present



● Templeton Global Multisector Plus ● Global Fixed Income Index

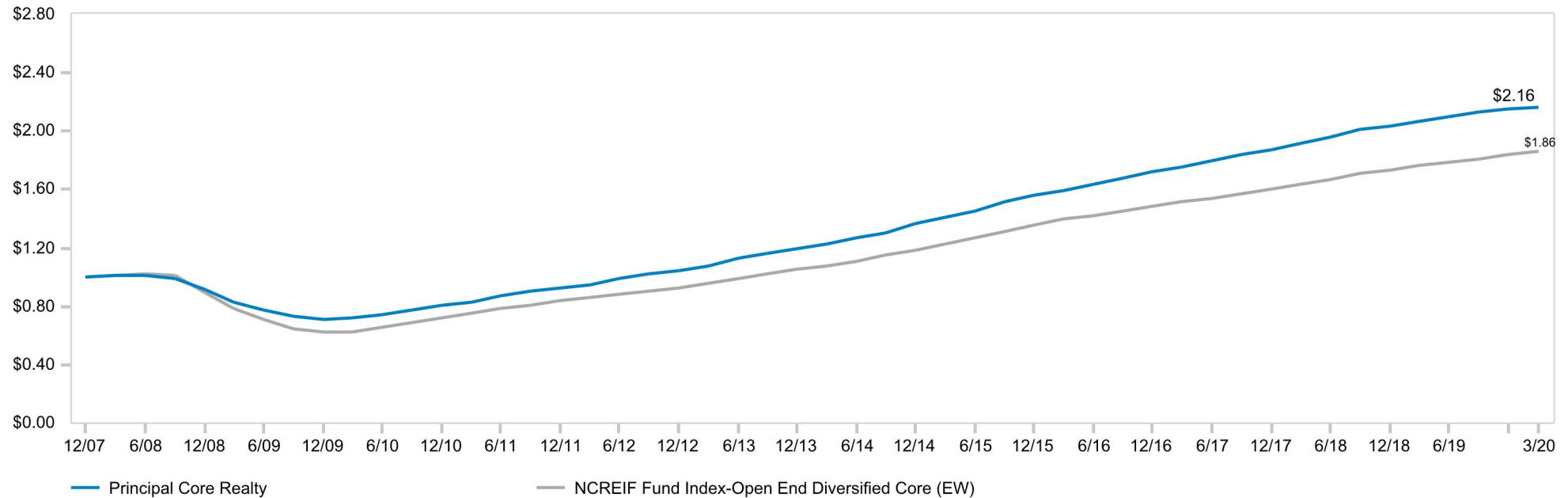
Historical Statistics: October 1, 2007 To March 31, 2020

	Consistency	Maximum Drawdown	Alpha	Active Return	Sharpe Ratio	Information Ratio	Treynor Ratio	Beta	Tracking Error
Templeton Global Multisector Plus	50.00	-8.96	2.73	1.53	0.61	0.22	0.07	0.76	7.09
Global Fixed Income Index	0.00	-12.97	0.00	0.00	0.51	N/A	0.04	1.00	0.00

Long-term composite performance. Actual client results may vary.
October 2007 represents the beginning of the current market cycle.
Peer Group: IM Global Unhedged Fixed Income (SA+CF)



Growth of a Dollar



Trailing Returns

	QTR	YTD	1 YR	2 YR	3 YR	5 YR	7 YR	10 YR	15 YR
Principal Core Realty	0.37 (77)	0.37 (77)	4.62 (67)	6.19 (69)	7.17 (58)	8.98 (53)	10.47 (52)	11.66 (62)	8.36 (29)
NCREIF Fund Index-Open End Diversified Core (EW)	0.90 (60)	0.90 (60)	5.25 (58)	6.49 (61)	7.04 (59)	8.74 (57)	10.01 (58)	11.50 (63)	7.35 (72)
Median	1.25	1.25	5.67	7.14	7.52	9.07	10.57	12.41	7.78

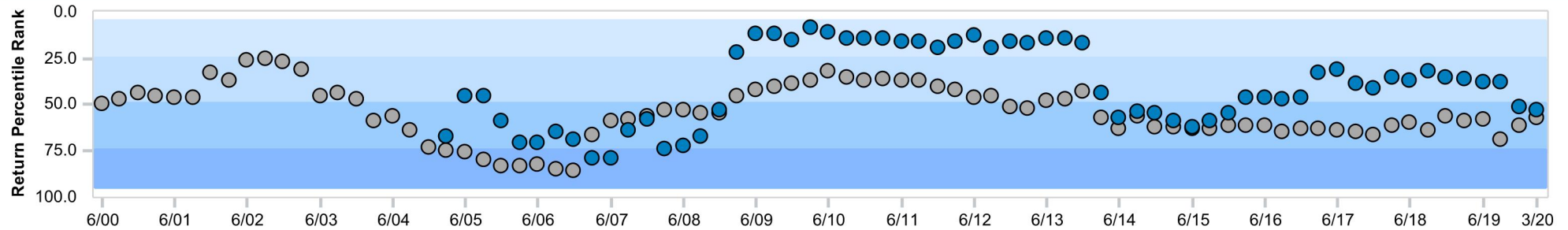
Fiscal Year Returns

	FYTD	FY 2019	FY 2018	FY 2017	FY 2016	FY 2015	FY 2014	FY 2013
Principal Core Realty	1.65 (71)	5.91 (74)	9.21 (45)	9.85 (22)	10.36 (70)	16.33 (33)	12.59 (52)	13.35 (46)
NCREIF Fund Index-Open End Diversified Core (EW)	2.44 (52)	6.17 (72)	8.82 (55)	7.81 (56)	10.62 (65)	14.71 (58)	12.39 (64)	12.47 (66)
Median	2.51	6.89	8.98	8.05	11.02	15.32	12.63	13.18

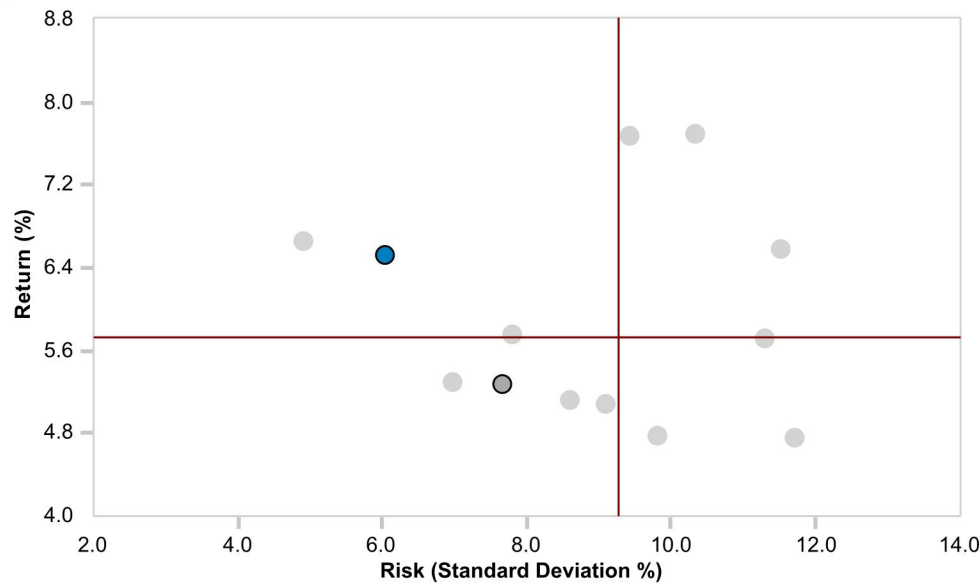
Long-term composite performance. Actual client results may vary.
October 2007 represents the beginning of the current market cycle.
Peer Group: IM U.S. Open End Private Real Estate (SA+CF)



5 Year Rolling Percentile Ranking

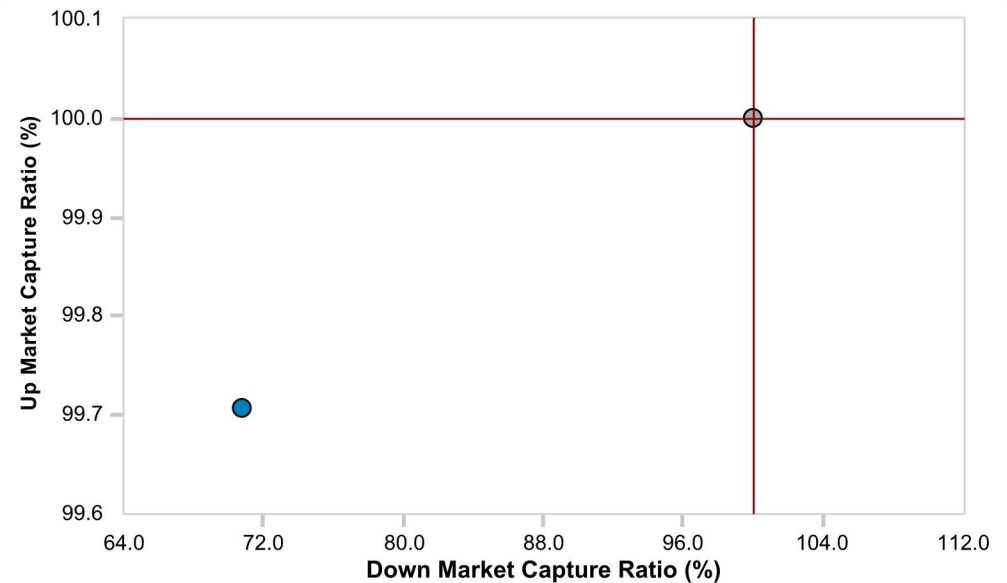


Risk vs Return: October 2007 to Present



● Principal Core Realty
● NCREIF Fund Index-Open End Diversified Core (EW)

Up/Down Markets: October 2007 to Present



● Principal Core Realty
● NCREIF Fund Index-Open End Diversified Core (EW)

Historical Statistics: October 1, 2007 To March 31, 2020

	Consistency	Maximum Drawdown	Alpha	Active Return	Sharpe Ratio	Information Ratio	Treynor Ratio	Beta	Tracking Error
Principal Core Realty	48.00	-29.46	2.34	1.07	0.94	0.50	0.08	0.77	2.13
NCREIF Fund Index-Open End Diversified Core (EW)	0.00	-39.11	0.00	0.00	0.61	N/A	0.05	1.00	0.00

Long-term composite performance. Actual client results may vary.
October 2007 represents the beginning of the current market cycle.
Peer Group: IM U.S. Open End Private Real Estate (SA+CF)



Total Fund Compliance:	Yes	No	N/A
1. The Total Plan return equaled or exceeded the Net 6.25% actuarial earnings assumption over the trailing three year period.		✓	
2. The Total Plan return equaled or exceeded the Net 6.25% actuarial earnings assumption over the trailing five year period.		✓	
3. The Total Plan return equaled or exceeded the total plan benchmark over the trailing three year period.		✓	
4. The Total Plan return equaled or exceeded the total plan benchmark over the trailing five year period.		✓	
5. The Total Plan return ranked within the top 40th percentile of its peer group over the trailing three year period.	✓		
6. The Total Plan return ranked within the top 40th percentile of its peer group over the trailing five year period.	✓		

Equity Compliance:	Yes	No	N/A
1. Total Domestic Equity return equaled or exceeded the benchmark over the trailing three year period.		✓	
2. Total Domestic Equity return equaled or exceeded the benchmark over the trailing five year period.		✓	
3. Total International Equity return equaled or exceeded the benchmark over the trailing three year period.	✓		
4. Total International Equity return equaled or exceeded the benchmark over the trailing five year period.	✓		
5. Total Equity investments do not exceed 75% of the market value of Plan assets.	✓		
6. Total market value of foreign securities do not exceed 25% of the market value of Plan assets.	✓		

Fixed Income Compliance:	Yes	No	N/A
1. Total Domestic Fixed Income return equaled or exceeded the benchmark over the trailing three year period.		✓	
2. Total Domestic Fixed Income return equaled or exceeded the benchmark over the trailing five year period.		✓	
3. Total Global Fixed Income return equaled or exceeded the benchmark over the trailing three year period.		✓	
4. Total Global Fixed Income return equaled or exceeded the benchmark over the trailing five year period.		✓	
5. 95% of the fixed income investments have a minimum rating of investment grade or higher.	✓		

Manager Compliance:	Anchor			MFS Gr (MFEKX)			Primecap (POGRX)			Vanguard (VIMAX)			Vanguard (VTSAX)		
	Yes	No	N/A	Yes	No	N/A	Yes	No	N/A	Yes	No	N/A	Yes	No	N/A
1. Manager outperformed the index over the trailing three year period.	✓					✓			✓	✓				✓	
2. Manager outperformed the index over the trailing five year period.	✓					✓			✓			✓			✓
3. Manager has had less than 4 consecutive quarters of underperformance.	✓			✓			✓			✓			✓		
4. Manager ranked within the top 40th percentile over the trailing three year period.		✓				✓			✓	✓			✓		
5. Manager ranked within the top 40th percentile over the trailing five year period.	✓					✓			✓			✓			✓
6. Manager three year down market capture ratio is less than the index.	✓					✓			✓	✓			✓		
7. Manager five year down market capture ratio is less than the index.	✓					✓			✓			✓			✓

Manager Compliance:	EuroPacific (RERGX)			Garcia Hamilton			Templeton (FTTRX)			Principal RE		
	Yes	No	N/A	Yes	No	N/A	Yes	No	N/A	Yes	No	N/A
1. Manager outperformed the index over the trailing three year period.	✓				✓			✓			✓	
2. Manager outperformed the index over the trailing five year period.	✓				✓			✓				✓
3. Manager has had less than 4 consecutive quarters of underperformance.	✓			✓			✓			✓		
4. Manager ranked within the top 40th percentile over the trailing three year period.	✓				✓			✓			✓	
5. Manager ranked within the top 40th percentile over the trailing five year period.	✓				✓			✓				✓
6. Manager three year down market capture ratio is less than the index.	✓			✓			✓					✓
7. Manager five year down market capture ratio is less than the index.			✓	✓			✓					✓



Total Fund Policy		Total Equity Policy	
Allocation Mandate	Weight (%)	Allocation Mandate	Weight (%)
Jan-1979		Jan-2005	
Russell 1000 Value Index	55.00	Russell 1000 Value Index	100.00
Blmbg. Barc. U.S. Gov't/Credit	40.00	Apr-2008	
FTSE 3 Month T-Bill	5.00	Russell 3000 Index	77.00
Apr-2008		MSCI EAFE Index	23.00
Russell 3000 Index	50.00	Dec-2013	
MSCI EAFE Index	15.00	Russell 3000 Index	77.00
Bloomberg Barclays Intermed Aggregate Index	25.00	MSCI AC World ex USA	23.00
Blmbg. Barc. U.S. TIPS 1-10 Year	5.00	Mar-2020	
FTSE 3 Month T-Bill	5.00	Russell 3000 Index	83.00
Aug-2011		MSCI AC World ex USA	17.00
Russell 3000 Index	50.00	Total Fixed Income Policy	
MSCI EAFE Index	15.00	Allocation Mandate	Weight (%)
Bloomberg Barclays Intermed Aggregate Index	25.00	Jan-1973	
Bloomberg Barclays U.S. TIPS Index	5.00	Blmbg. Barc. U.S. Gov't/Credit	100.00
FTSE 3 Month T-Bill	5.00	Apr-2008	
Dec-2013		Bloomberg Barclays Intermed Aggregate Index	83.00
S&P 500 Index	50.00	Blmbg. Barc. U.S. TIPS 1-10 Year	17.00
MSCI AC World ex USA	15.00	Aug-2011	
Bloomberg Barclays Intermed Aggregate Index	25.00	Bloomberg Barclays Intermed Aggregate Index	83.00
Diversified Fixed Income Policy	5.00	Bloomberg Barclays U.S. TIPS Index	17.00
FTSE 3 Month T-Bill	5.00	Dec-2013	
Sep-2015		Bloomberg Barclays Intermed Aggregate Index	83.00
Russell 3000 Index	50.00	Diversified Fixed Income Policy	17.00
MSCI AC World ex USA	15.00	Sep-2015	
Bloomberg Barclays Intermed Aggregate Index	20.00	Bloomberg Barclays Intermed Aggregate Index	80.00
Diversified Fixed Income Policy	5.00	Diversified Fixed Income Policy	20.00
NCREIF Fund Index-Open End Diversified Core (EW)	10.00	Mar-2020	
Mar-2020		Bloomberg Barclays Intermed Aggregate Index	83.00
Russell 3000 Index	50.00	Diversified Fixed Income Policy	17.00
MSCI AC World ex USA	10.00		
Bloomberg Barclays Intermed Aggregate Index	25.00		
Diversified Fixed Income Policy	5.00		
NCREIF Fund Index-Open End Diversified Core (EW)	10.00		



Total Domestic Equity Policy		Total Domestic Fixed Income Policy	
Allocation Mandate	Weight (%)	Allocation Mandate	Weight (%)
Jan-2005		Jan-1973	
Russell 1000 Value Index	100.00	Blmbg. Barc. U.S. Gov't/Credit	100.00
Apr-2008		Apr-2008	
Russell 3000 Index	100.00	Bloomberg Barclays Intermed Aggregate Index	83.00
		Blmbg. Barc. U.S. TIPS 1-10 Year	17.00
		Aug-2011	
		Bloomberg Barclays Intermed Aggregate Index	83.00
		Bloomberg Barclays U.S. TIPS Index	17.00
		Dec-2013	
		Bloomberg Barclays Intermed Aggregate Index	100.00
Total International Equity Policy		Total Diversified Income Policy	
Allocation Mandate	Weight (%)	Allocation Mandate	Weight (%)
Apr-2008		Jan-1994	
MSCI EAFE Index	100.00	JPM EMBI+	33.33
Dec-2013		FTSE Non-U.S. World Government Bond	33.33
MSCI AC World ex USA	100.00	Blmbg. Barc. U.S. Corp High Yield	33.34

- Returns prior to 3/31/2010 for Anchor All Cap Value are the equity returns from the Anchor balanced account.
- Village cash flows represent Plan expenses paid from accounts external to the Pension Plan's investment portfolios.
- Neither AndCo, nor any covered associates, have made political contributions to any official associated with the Palm Springs General Employees' Pension Plan in excess of the permitted amount.

Active Return	- Arithmetic difference between the manager's performance and the designated benchmark return over a specified time period.
Alpha	- A measure of the difference between a portfolio's actual performance and its expected return based on its level of risk as determined by beta. It determines the portfolio's non-systemic return, or its historical performance not explained by movements of the market.
Beta	- A measure of the sensitivity of a portfolio to the movements in the market. It is a measure of the portfolio's systematic risk.
Consistency	- The percentage of quarters that a product achieved a rate of return higher than that of its benchmark. Higher consistency indicates the manager has contributed more to the product's performance.
Distributed to Paid In (DPI)	- The ratio of money distributed to Limited Partners by the fund, relative to contributions. It is calculated by dividing cumulative distributions by paid in capital. This multiple shows the investor how much money they got back. It is a good measure for evaluating a fund later in its life because there are more distributions to measure against.
Down Market Capture	- The ratio of average portfolio performance over the designated benchmark during periods of negative returns. A lower value indicates better product performance
Downside Risk	- A measure similar to standard deviation that utilizes only the negative movements of the return series. It is calculated by taking the standard deviation of the negative quarterly set of returns. A higher factor is indicative of a riskier product.
Excess Return	- Arithmetic difference between the manager's performance and the risk-free return over a specified time period.
Excess Risk	- A measure of the standard deviation of a portfolio's performance relative to the risk free return.
Information Ratio	- This calculates the value-added contribution of the manager and is derived by dividing the active rate of return of the portfolio by the tracking error. The higher the Information Ratio, the more the manager has added value to the portfolio.
Public Market Equivalent (PME)	- Designs a set of analyses used in the Private Equity Industry to evaluate the performance of a Private Equity Fund against a public benchmark or index.
R-Squared	- The percentage of a portfolio's performance that can be explained by the behavior of the appropriate benchmark. A high R-Squared means the portfolio's performance has historically moved in the same direction as the appropriate benchmark.
Return	- Compounded rate of return for the period.
Sharpe Ratio	- Represents the excess rate of return over the risk free return divided by the standard deviation of the excess return. The result is an absolute rate of return per unit of risk. A higher value demonstrates better historical risk-adjusted performance.
Standard Deviation	- A statistical measure of the range of a portfolio's performance. It represents the variability of returns around the average return over a specified time period.
Total Value to Paid In (TVPI)	- The ratio of the current value of remaining investments within a fund, plus the total value of all distributions to date, relative to the total amount of capital paid into the fund to date. It is a good measure of performance before the end of a fund's life
Tracking Error	- This is a measure of the standard deviation of a portfolio's returns in relation to the performance of its designated market benchmark.
Treynor Ratio	- Similar to Sharpe ratio but utilizes beta rather than excess risk as determined by standard deviation. It is calculated by taking the excess rate of return above the risk free rate divided by beta to derive the absolute rate of return per unit of risk. A higher value indicates a product has achieved better historical risk-adjusted performance.
Up Market Capture	- The ratio of average portfolio performance over the designated benchmark during periods of positive returns. A higher value indicates better product performance.



AndCo compiled this report for the sole use of the client for which it was prepared. AndCo is responsible for evaluating the performance results of the Total Fund along with the investment advisors by comparing their performance with indices and other related peer universe data that is deemed appropriate. AndCo uses the results from this evaluation to make observations and recommendations to the client.

AndCo uses time-weighted calculations which are founded on standards recommended by the CFA Institute. The calculations and values shown are based on information that is received from custodians. AndCo analyzes transactions as indicated on the custodian statements and reviews the custodial market values of the portfolio. As a result, this provides AndCo with a reasonable basis that the investment information presented is free from material misstatement. This methodology of evaluating and measuring performance provides AndCo with a practical foundation for our observations and recommendations. Nothing came to our attention that would cause AndCo to believe that the information presented is significantly misstated.

This performance report is based on data obtained by the client's custodian(s), investment fund administrator, or other sources believed to be reliable. While these sources are believed to be reliable, the data providers are responsible for the accuracy and completeness of their statements. Clients are encouraged to compare the records of their custodian(s) to ensure this report fairly and accurately reflects their various asset positions.

The strategies listed may not be suitable for all investors. We believe the information provided here is reliable, but do not warrant its accuracy or completeness. Past performance is not an indication of future performance. Any information contained in this report is for informational purposes only and should not be construed to be an offer to buy or sell any securities, investment consulting, or investment management services.

Additional information included in this document may contain data provided by from index databases, public economic sources and the managers themselves.

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March 4, 2020

Ms. Patti Waller
Village of Palm Springs General Employees' Pension Plan
c/o Pension Resource Center
4360 Northlake Boulevard, Suite 206
Palm Beach Gardens, FL 33410

Dear Ms. Waller,

Thank you for your continued support over the past 10 years and we welcome the opportunity to serve the Village of Palm Springs General Employees' Pension Plan.

We recently revised our institutional fee structure for unification of all AndCo Consulting clients at Anchor Capital. As a result, the fee structure for our All Cap Value strategy will be adjusted.

Existing fee structure

50 bps on all of the assets

New proposed fee structure

60 bps on the first \$8 million and 50 bps on the excess

Based on your asset level as of 12/31/2019, your current rate of 0.5% will be modified to 0.6%. This is an increase to the management fee of 0.1% or approximately \$3,700 on an annualized basis.

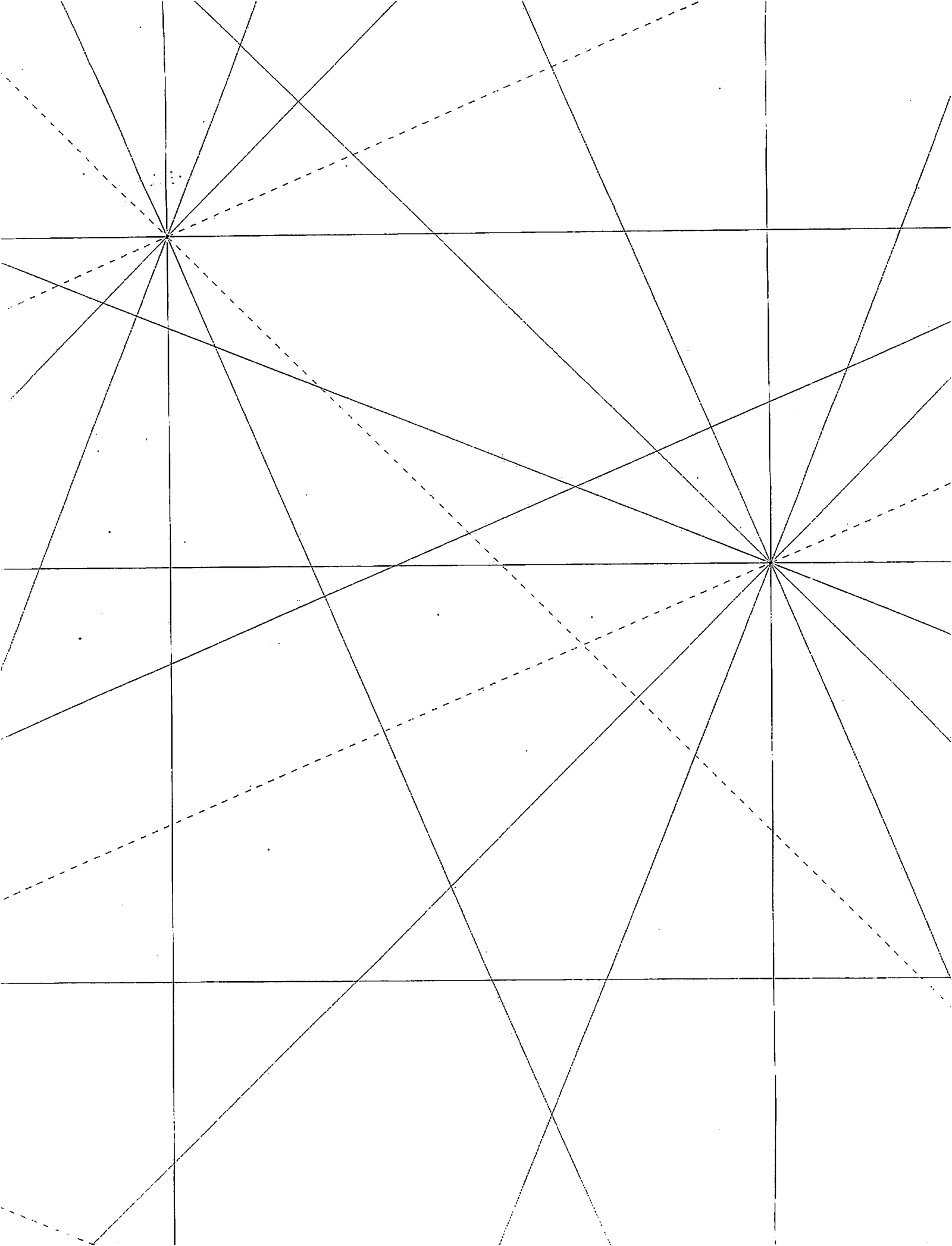
To formally execute this fee modification please sign and return the attached addendum.

Best Regards,



John P. Boles
Director of Institutional Marketing

Cc:
Jennifer Gainfort – AndCo Consulting
William P. Rice, Jr – Anchor Capital Advisors



**Contract Amendment**

Anchor Capital Advisors, LLC, ("Anchor"), and Village of Palm Springs General Employees' Pension Plan, ("Client"), hereby agree to amend the investment management agreement entered into by the parties as of the accounts inception date of March 3, 2010 as follows:

Annual Management Fee Rate:

Account Assets Under Management	Fee Rate
Up to \$8 million	.60%
Over \$8 million	.50%

The Management Fee shall be calculated and payable quarterly in arrears on the last day of such quarter at one fourth (1/4th) the annual fee and shall be computed upon fair market value of the assets as of the last business day of the immediately preceding calendar quarter. If services to be rendered under the Investment Management Agreement shall commence on a day other than the first day of a quarter, or end on a day other than the end of a calendar quarter, the fee shall be prorated based on the number of days in the quarter. The Management Fee with respect to interim contributions of assets into the Account shall be billed in arrears on a pro-rated basis. The prices provided by the Custodian will generally be used when valuing assets in the Account for purposes of calculating the Management Fee.

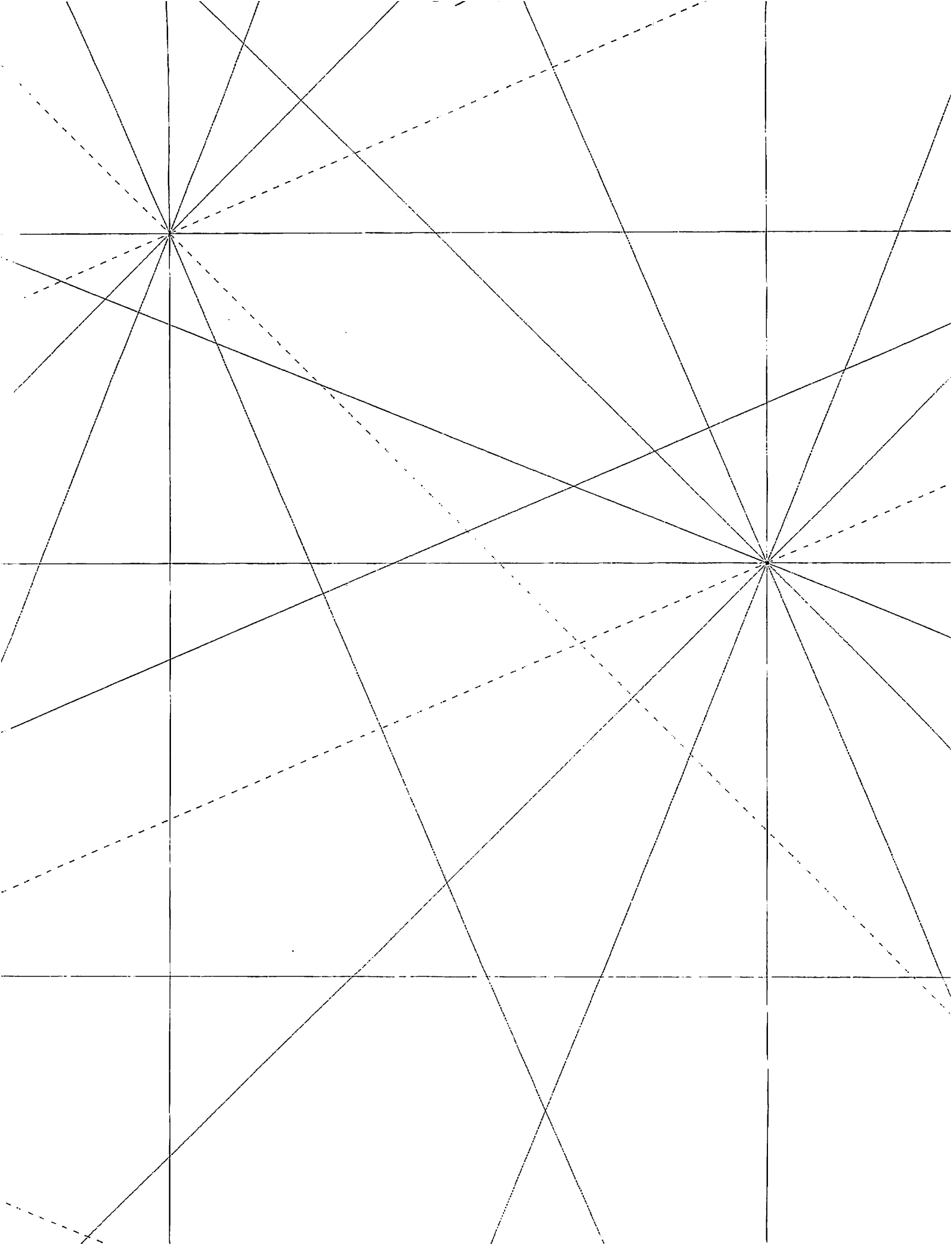
Client hereby authorizes Adviser to receive the Management Fee from the assets of the Account when due. Client hereby directs the Custodian to pay the Management Fee directly to Adviser when due and payable:

☐ Yes

☐ No

In witness whereof, the parties have agreed to and executed this amend on the day and year indicated below.

Village of Palm Springs GE Pension Plan	Anchor Capital Advisors, LLC.
By:	By:
Patti Waller	William P. Rice, Jr.
Signature: _____	Signature: _____
Title: _____	Title: CEO
Date: _____	Date: _____





MEMORANDUM

TO: Board of Trustees

FROM: Bonni S. Jensen
Fund Legal Counsel

DATE: April, 2020

RE: ANNUAL FORM 1 FILING

Attached is Commission on Ethics (CE) Form 1 "Statement of Financial Interests" which must be filed by Trustees with the Supervisor of Elections for the county in which you reside, prior to **July 1, 2020**. The instructions for filing and completing the form are also attached. Please be sure to review them again as the Form was updated last year.

Remember:

- If you are entitled to confidentiality in your address as provided by Florida Statutes 119.071, you may request the Commission on Ethics to maintain that confidentiality in writing. In the past, some trustees have used their work address or a post office box instead.
- Under the law, your CPA or personal attorney can complete this Form 1 for you.

You may complete the form online using your keyboard to fill in the information, tabbing from one section to the next. However, you must print the completed form (just pages 1 and 2), sign and date it, then send it by mail or email to the **Supervisor of Elections for the county in which you reside**. There is no current system available to file online.

It is important that you timely file this form because the penalty for failure to timely file is \$25.00 per day, to a maximum of \$1,500.00. I suggest that you file this form by certified mail, return receipt requested, and keep a photo copy of the form for your files. Several Trustees have had to show proof of filing in the past, so it is my practice to always get a receipt for such documents.

If you have any questions or if I may be of any assistance to you at all, please do not hesitate to contact me or my assistant, Dulce.

FORM 1**STATEMENT OF
FINANCIAL INTERESTS****2019**Please print or type your name, mailing
address, agency name, and position below:**FOR OFFICE USE ONLY:**

LAST NAME -- FIRST NAME -- MIDDLE NAME :

MAILING ADDRESS :

CITY : ZIP : COUNTY :

NAME OF AGENCY :

NAME OF OFFICE OR POSITION HELD OR SOUGHT :

CHECK ONLY IF ☐ CANDIDATE OR ☐ NEW EMPLOYEE OR APPOINTEE****** THIS SECTION MUST BE COMPLETED ********DISCLOSURE PERIOD:**

THIS STATEMENT REFLECTS YOUR FINANCIAL INTERESTS FOR CALENDAR YEAR ENDING DECEMBER 31, 2019.

MANNER OF CALCULATING REPORTABLE INTERESTS:

FILERS HAVE THE OPTION OF USING REPORTING THRESHOLDS THAT ARE ABSOLUTE DOLLAR VALUES, WHICH REQUIRES FEWER CALCULATIONS, OR USING COMPARATIVE THRESHOLDS, WHICH ARE USUALLY BASED ON PERCENTAGE VALUES (see instructions for further details). CHECK THE ONE YOU ARE USING (**must check one**):

☐ **COMPARATIVE (PERCENTAGE) THRESHOLDS** OR ☐ **DOLLAR VALUE THRESHOLDS****PART A -- PRIMARY SOURCES OF INCOME** [Major sources of income to the reporting person - See instructions]
(If you have nothing to report, write "none" or "n/a")

NAME OF SOURCE OF INCOME	SOURCE'S ADDRESS	DESCRIPTION OF THE SOURCE'S PRINCIPAL BUSINESS ACTIVITY

PART B -- SECONDARY SOURCES OF INCOME[Major customers, clients, and other sources of income to businesses owned by the reporting person - See instructions]
(If you have nothing to report, write "none" or "n/a")

NAME OF BUSINESS ENTITY	NAME OF MAJOR SOURCES OF BUSINESS' INCOME	ADDRESS OF SOURCE	PRINCIPAL BUSINESS ACTIVITY OF SOURCE

PART C -- REAL PROPERTY [Land, buildings owned by the reporting person - See instructions]
(If you have nothing to report, write "none" or "n/a")

You are not limited to the space on the lines on this form. Attach additional sheets, if necessary.**FILING INSTRUCTIONS** for when and where to file this form are located at the bottom of page 2.**INSTRUCTIONS** on who must file this form and how to fill it out begin on page 3.

PART D — INTANGIBLE PERSONAL PROPERTY [Stocks, bonds, certificates of deposit, etc. - See instructions]
(If you have nothing to report, write "none" or "n/a")

TYPE OF INTANGIBLE	BUSINESS ENTITY TO WHICH THE PROPERTY RELATES

PART E — LIABILITIES [Major debts - See instructions]
(If you have nothing to report, write "none" or "n/a")

NAME OF CREDITOR	ADDRESS OF CREDITOR

PART F — INTERESTS IN SPECIFIED BUSINESSES [Ownership or positions in certain types of businesses - See instructions]
(If you have nothing to report, write "none" or "n/a")

	BUSINESS ENTITY # 1	BUSINESS ENTITY # 2
NAME OF BUSINESS ENTITY		
ADDRESS OF BUSINESS ENTITY		
PRINCIPAL BUSINESS ACTIVITY		
POSITION HELD WITH ENTITY		
I OWN MORE THAN A 5% INTEREST IN THE BUSINESS		
NATURE OF MY OWNERSHIP INTEREST		

PART G — TRAINING

For **elected municipal officers** required to complete annual ethics training pursuant to section 112.3142, F.S.

☐ **I CERTIFY THAT I HAVE COMPLETED THE REQUIRED TRAINING.**

IF ANY OF PARTS A THROUGH G ARE CONTINUED ON A SEPARATE SHEET, PLEASE CHECK HERE ☐

SIGNATURE OF FILER:

Signature:

Date Signed:

CPA or ATTORNEY SIGNATURE ONLY

If a certified public accountant licensed under Chapter 473, or attorney in good standing with the Florida Bar prepared this form for you, he or she must complete the following statement:

I, _____, prepared the CE Form 1 in accordance with Section 112.3145, Florida Statutes, and the instructions to the form. Upon my reasonable knowledge and belief, the disclosure herein is true and correct.

CPA/Attorney Signature: _____

Date Signed: _____

FILING INSTRUCTIONS:

If you were mailed the form by the Commission on Ethics or a County Supervisor of Elections for your annual disclosure filing, return the form to that location. To determine what category your position falls under, see page 3 of instructions.

Local officers/employees file with the Supervisor of Elections of the county in which they permanently reside. (If you do not permanently reside in Florida, file with the Supervisor of the county where your agency has its headquarters.) Form 1 filers who file with the Supervisor of Elections may file by mail or email. Contact your Supervisor of Elections for the mailing address or email address to use. Do not email your form to the Commission on Ethics, it will be returned.

State officers or specified state employees who file with the Commission on Ethics may file by mail or email. To file by mail, send the completed form to P.O. Drawer 15709, Tallahassee, FL 32317-5709; physical address: 325 John Knox Rd, Bldg E, Ste 200, Tallahassee, FL 32303. To file with the Commission by email, scan your completed form and any attachments as a pdf (do not use any other format), send it to CEForm1@leg.state.fl.us and retain a copy for your records. Do not file by both mail and email. Choose only one filing method. Form 6s will not be accepted via email.

Candidates file this form together with their filing papers.

MULTIPLE FILING UNNECESSARY: A candidate who files a Form 1 with a qualifying officer is not required to file with the Commission or Supervisor of Elections.

WHEN TO FILE: Initially, each local officer/employee, state officer, and specified state employee must file **within 30 days** of the date of his or her appointment or of the beginning of employment. Appointees who must be confirmed by the Senate must file prior to confirmation, even if that is less than 30 days from the date of their appointment.

Candidates must file at the same time they file their qualifying papers.

Thereafter, file by July 1 following each calendar year in which they hold their positions.

Finally, file a final disclosure form (Form 1F) within 60 days of leaving office or employment. Filing a CE Form 1F (Final Statement of Financial Interests) does not relieve the filer of filing a CE Form 1 if the filer was in his or her position on December 31, 2019.

NOTICE

Annual Statements of Financial Interests are due July 1. If the annual form is not filed or postmarked by September 1, an automatic fine of \$25 for each day late will be imposed, up to a maximum penalty of \$1,500. Failure to file also can result in removal from public office or employment. [s. 112.3145, F.S.]

In addition, failure to make any required disclosure constitutes grounds for and may be punished by one or more of the following: disqualification from being on the ballot, impeachment, removal or suspension from office or employment, demotion, reduction in salary, reprimand, or a civil penalty not exceeding \$10,000. [s. 112.317, F.S.]

WHO MUST FILE FORM 1:

1) Elected public officials not serving in a political subdivision of the state and any person appointed to fill a vacancy in such office, unless required to file full disclosure on Form 6.

2) Appointed members of each board, commission, authority, or council having statewide jurisdiction, excluding members of solely advisory bodies, but including judicial nominating commission members; Directors of Enterprise Florida, Scripps Florida Funding Corporation, and Career Source Florida; and members of the Council on the Social Status of Black Men and Boys; the Executive Director, Governors, and senior managers of Citizens Property Insurance Corporation; Governors and senior managers of Florida Workers' Compensation Joint Underwriting Association; board members of the Northeast Fla. Regional Transportation Commission; board members of Triumph Gulf Coast, Inc.; board members of Florida Is For Veterans, Inc.; and members of the Technology Advisory Council within the Agency for State Technology.

3) The Commissioner of Education, members of the State Board of Education, the Board of Governors, the local Boards of Trustees and Presidents of state universities, and the Florida Prepaid College Board.

4) Persons elected to office in any political subdivision (such as municipalities, counties, and special districts) and any person appointed to fill a vacancy in such office, unless required to file Form 6.

5) Appointed members of the following boards, councils, commissions, authorities, or other bodies of county, municipality, school district, independent special district, or other political subdivision: the governing body of the subdivision; community college or junior college district boards of trustees; boards having the power to enforce local code provisions; boards of adjustment; community redevelopment agencies; planning or zoning boards having the power to recommend, create, or modify land planning or zoning within a political subdivision, except for citizen advisory committees, technical coordinating committees, and similar groups who only have the power to make recommendations to planning or zoning boards, and except for representatives of a military installation acting on behalf of all military installations within that jurisdiction; pension or retirement boards empowered to invest pension or retirement funds or determine entitlement to or amount of pensions or other retirement benefits, and the Pinellas County Construction Licensing Board.

6) Any appointed member of a local government board who is required to file a statement of financial interests by the appointing authority or the enabling legislation, ordinance, or resolution creating the board.

7) Persons holding any of these positions in local government: mayor; county or city manager; chief administrative employee or finance

director of a county, municipality, or other political subdivision; county or municipal attorney; chief county or municipal building inspector; county or municipal water resources coordinator; county or municipal pollution control director; county or municipal environmental control director; county or municipal administrator with power to grant or deny a land development permit; chief of police; fire chief; municipal clerk; appointed district school superintendent; community college president; district medical examiner; purchasing agent (regardless of title) having the authority to make any purchase exceeding \$35,000 for the local governmental unit.

8) Officers and employees of entities serving as chief administrative officer of a political subdivision.

9) Members of governing boards of charter schools operated by a city or other public entity.

10) Employees in the office of the Governor or of a Cabinet member who are exempt from the Career Service System, excluding secretarial, clerical, and similar positions.

11) The following positions in each state department, commission, board, or council: Secretary, Assistant or Deputy Secretary, Executive Director, Assistant or Deputy Executive Director, and anyone having the power normally conferred upon such persons, regardless of title.

12) The following positions in each state department or division: Director, Assistant or Deputy Director, Bureau Chief, and any person having the power normally conferred upon such persons, regardless of title.

13) Assistant State Attorneys, Assistant Public Defenders, criminal conflict and civil regional counsel, and assistant criminal conflict and civil regional counsel, Public Counsel, full-time state employees serving as counsel or assistant counsel to a state agency, administrative law judges, and hearing officers.

14) The Superintendent or Director of a state mental health institute established for training and research in the mental health field, or any major state institution or facility established for corrections, training, treatment, or rehabilitation.

15) State agency Business Managers, Finance and Accounting Directors, Personnel Officers, Grant Coordinators, and purchasing agents (regardless of title) with power to make a purchase exceeding \$35,000.

16) The following positions in legislative branch agencies: each employee (other than those employed in maintenance, clerical, secretarial, or similar positions and legislative assistants exempted by the presiding officer of their house); and each employee of the Commission on Ethics.

INSTRUCTIONS FOR COMPLETING FORM 1:

INTRODUCTORY INFORMATION (Top of Form): If your name, mailing address, public agency, and position are already printed on the form, you do not need to provide this information unless it should be changed. To change any of this information, write the correct information on the form, and contact your agency's financial disclosure coordinator. You can find your coordinator on the Commission on Ethics website: www.ethics.state.fl.us.

NAME OF AGENCY: The name of the governmental unit which you serve or served, by which you are or were employed, or for which you are a candidate.

DISCLOSURE PERIOD: The "disclosure period" for your report is the calendar year ending December 31, 2019.

OFFICE OR POSITION HELD OR SOUGHT: The title of the office or position you hold, are seeking, or held during the disclosure period even if you have since left that position. If you are a candidate for office or are a new employee or appointee, check the appropriate box.

PUBLIC RECORD: The disclosure form and everything attached to it is a public record. Your Social Security Number is not required and you should redact it from any documents you file. If you are an active or former officer or employee listed in Section 119.071, F.S., whose home address is exempt from disclosure, the Commission will maintain that confidentiality if you submit a written request.

MANNER OF CALCULATING REPORTABLE INTEREST

Filers have the option of reporting based on either thresholds that are comparative (usually, based on percentage values) or thresholds that are based on absolute dollar values. The instructions on the following pages specifically describe the different thresholds. Check the box that reflects the choice you have made. You must use the type of threshold you have chosen for each part of the form. In other words, if you choose to report based on absolute dollar value thresholds, you cannot use a percentage threshold on any part of the form.

IF YOU HAVE CHOSEN DOLLAR VALUE THRESHOLDS THE FOLLOWING INSTRUCTIONS APPLY

PART A — PRIMARY SOURCES OF INCOME

[Required by s. 112.3145(3)(b)1, F.S.]

Part A is intended to require the disclosure of your principal sources of income during the disclosure period. You do not have to disclose any public salary or public position(s). The income of your spouse need not be disclosed; however, if there is joint income to you and your spouse from property you own jointly (such as interest or dividends from a bank account or stocks), you should disclose the source of that income if it exceeded the threshold.

Please list in this part of the form the name, address, and principal business activity of each source of your income which exceeded \$2,500 of gross income received by you in your own name or by any other person for your use or benefit.

"Gross income" means the same as it does for income tax purposes, even if the income is not actually taxable, such as interest on tax-free bonds. Examples include: compensation for services, income from business, gains from property dealings, interest, rents, dividends, pensions, IRA distributions, social security, distributive share of partnership gross income, and alimony, but not child support.

Examples:

— If you were employed by a company that manufactures computers and received more than \$2,500, list the name of the company, its address, and its principal business activity (computer manufacturing).

— If you were a partner in a law firm and your distributive share of partnership gross income exceeded \$2,500, list the name of the firm, its address, and its principal business activity (practice of law).

— If you were the sole proprietor of a retail gift business and your gross income from the business exceeded \$2,500, list the name of the business, its address, and its principal business activity (retail gift sales).

— If you received income from investments in stocks and bonds, list each individual company from which you derived more than \$2,500. Do not aggregate all of your investment income.

— If more than \$2,500 of your gross income was gain from the sale of property (not just the selling price), list as a source of income the purchaser's name, address and principal business activity. If the purchaser's identity is unknown, such as where securities listed on an exchange are sold through a brokerage firm, the source of income should be listed as "sale of (name of company) stock," for example.

— If more than \$2,500 of your gross income was in the form of interest from one particular financial institution (aggregating interest from all CD's, accounts, etc., at that institution), list the name of the institution, its address, and its principal business activity.

PART B — SECONDARY SOURCES OF INCOME

[Required by s. 112.3145(3)(b)2, F.S.]

This part is intended to require the disclosure of major customers, clients, and other sources of income to businesses in which you own an interest. It is not for reporting income from second jobs. That kind of income should be reported in Part A "Primary Sources of Income," if it meets the reporting threshold. You will not have anything to report unless, during the disclosure period:

(1) You owned (either directly or indirectly in the form of an equitable or beneficial interest) more than 5% of the total assets or capital stock of a business entity (a corporation, partnership, LLC, limited partnership, proprietorship, joint venture, trust, firm, etc., doing business in Florida); **and,**

(2) You received more than \$5,000 of your gross income during the disclosure period from that business entity.

If your interests and gross income exceeded these thresholds, then for that business entity you must list every source of income to the business entity which exceeded 10% of the business entity's gross income (computed on the basis of the business entity's most recently completed fiscal year), the source's address, and the source's principal business activity.

Examples:

— You are the sole proprietor of a dry cleaning business, from which you received more than \$5,000. If only one customer, a uniform rental company, provided more than 10% of your dry cleaning business, you must list the name of the uniform rental company, its address, and its principal business activity (uniform rentals).

— You are a 20% partner in a partnership that owns a shopping mall and your partnership income exceeded the above thresholds. List each tenant of the mall that provided more than 10% of the partnership's gross income and the tenant's address and principal business activity.

PART C — REAL PROPERTY

[Required by s. 112.3145(3)(b)3, F.S.]

In this part, list the location or description of all real property in Florida in which you owned directly or indirectly at any time during the disclosure period in excess of 5% of the property's value. You are not required to list your residences. You should list any vacation homes if you derive income from them.

Indirect ownership includes situations where you are a beneficiary of a trust that owns the property, as well as situations where you own more than 5% of a partnership or corporation that owns the property. The value of the property may be determined by the most recently assessed value for tax purposes, in the absence of a more current appraisal.

The location or description of the property should be sufficient to enable anyone who looks at the form to identify the property. A street address should be used, if one exists.

PART D — INTANGIBLE PERSONAL PROPERTY

[Required by s. 112.3145(3)(b)3, F.S.]

Describe any intangible personal property that, at any time during the disclosure period, was worth more than \$10,000 and state the business entity to which the property related. Intangible personal property includes things such as cash on hand, stocks, bonds, certificates of deposit, vehicle leases, interests in businesses, beneficial interests in trusts, money owed you, Deferred Retirement Option Program (DROP) accounts, the Florida Prepaid College Plan, and bank accounts. Intangible personal property also includes investment products held in IRAs, brokerage accounts, and the Florida College Investment Plan. Note that the product contained in a brokerage account, IRA, or the Florida College Investment Plan is your asset—not the account or plan itself. Things like automobiles and houses you own, jewelry, and paintings are not intangible property. Intangibles relating to the same business entity may be aggregated; for example, CDs and savings accounts with the same bank. Property owned as tenants by the entirety or as joint tenants with right of survivorship should be valued at 100%. The value of a leased vehicle is the vehicle's present value minus the lease residual (a number found on the lease document).

PART E — LIABILITIES

[Required by s. 112.3145(3)(b)4, F.S.]

List the name and address of each creditor to whom you owed more than \$10,000 at any time during the disclosure period. The amount of the liability of a vehicle lease is the sum of any past-due payments and all unpaid prospective lease payments. You are not required to list the amount of any debt. You do not have to disclose credit card and retail installment accounts, taxes owed (unless reduced to a judgment), indebtedness on a life insurance policy owed to the company of issuance, or contingent liabilities. A "contingent liability" is one that will become an actual liability only when one or more future events occur or fail to occur, such as where you are liable only as a guarantor, surety, or endorser on a promissory note. If you are a "co-maker" and are jointly liable or jointly and severally liable, then it is not a contingent liability.

PART F — INTERESTS IN SPECIFIED BUSINESSES

[Required by s. 112.3145(6), F.S.]

The types of businesses covered in this disclosure include: state and federally chartered banks; state and federal savings and loan associations; cemetery companies; insurance companies; mortgage companies; credit unions; small loan companies; alcoholic beverage licensees; pari-mutuel wagering companies; utility companies, entities controlled by the Public Service Commission; and entities granted a franchise to operate by either a city or a county government.

Disclose in this part the fact that you owned during the disclosure period an interest in, or held any of certain positions with the types of businesses listed above. You must make this disclosure if you own or owned (either directly or indirectly in the form of an equitable or beneficial interest) at any time during the disclosure period more than 5% of the total assets or capital stock of one of the types of business entities listed above. You also must complete this part of the form for each of these types of businesses for which you are, or were at any time during the disclosure period, an officer, director, partner, proprietor, or agent (other than a resident agent solely for service of process).

If you have or held such a position or ownership interest in one of these types of businesses, list the name of the business, its address and principal business activity, and the position held with the business (if any). If you own(ed) more than a 5% interest in the business, indicate that fact and describe the nature of your interest.

PART G — TRAINING CERTIFICATION

[Required by s. 112.3142, F.S.]

If you are a Constitutional or elected municipal officer whose service began before March 31 of the year for which you are filing, you are required to complete four hours of ethics training which addresses Article II, Section 8 of the Florida Constitution, the Code of Ethics for Public Officers and Employees, and the public records and open meetings laws of the state. You are required to certify on this form that you have taken such training.

(End of Dollar Value Thresholds Instructions.)

IF YOU HAVE CHOSEN COMPARATIVE (PERCENTAGE) THRESHOLDS THE FOLLOWING INSTRUCTIONS APPLY

PART A — PRIMARY SOURCES OF INCOME

[Required by s. 112.3145(3)(a)1, F.S.]

Part A is intended to require the disclosure of your principal sources of income during the disclosure period. You do not have to disclose any public salary or public position(s), but income from these public sources should be included when calculating your gross income for the disclosure period. The income of your spouse need not be disclosed; however, if there is joint income to you and your spouse from property you own jointly (such as interest or dividends from a bank account or stocks), you should include all of that income when calculating your gross income and disclose the source of that income if it exceeded the threshold.

Please list in this part of the form the name, address, and principal business activity of each source of your income which exceeded 5% of the gross income received by you in your own name or by any other person for your benefit or use during the disclosure period.

"Gross income" means the same as it does for income tax purposes, even if the income is not actually taxable, such as interest on tax-free bonds. Examples include: compensation for services, income from business, gains from property dealings, interest, rents, dividends, pensions, IRA distributions, social security, distributive share of partnership gross income, and alimony, but not child support.

Examples:

— If you were employed by a company that manufactures computers and received more than 5% of your gross income from the company, list the name of the company, its address, and its principal business activity (computer manufacturing).

— If you were a partner in a law firm and your distributive share of partnership gross income exceeded 5% of your gross income, then list the name of the firm, its address, and its principal business activity (practice of law).

— If you were the sole proprietor of a retail gift business and your gross income from the business exceeded 5% of your total gross income, list the name of the business, its address, and its principal business activity (retail gift sales).

— If you received income from investments in stocks and bonds, list each individual company from which you derived

more than 5% of your gross income. Do not aggregate all of your investment income.

— If more than 5% of your gross income was gain from the sale of property (not just the selling price), list as a source of income the purchaser's name, address, and principal business activity. If the purchaser's identity is unknown, such as where securities listed on an exchange are sold through a brokerage firm, the source of income should be listed as "sale of (name of company) stock," for example.

— If more than 5% of your gross income was in the form of interest from one particular financial institution (aggregating interest from all CD's, accounts, etc., at that institution), list the name of the institution, its address, and its principal business activity.

PART B — SECONDARY SOURCES OF INCOME

[Required by s. 112.3145(3)(a)2, F.S.]

This part is intended to require the disclosure of major customers, clients, and other sources of income to businesses in which you own an interest. It is not for reporting income from second jobs. That kind of income should be reported in Part A, "Primary Sources of Income," if it meets the reporting threshold. You will **not** have anything to report **unless** during the disclosure period:

(1) You owned (either directly or indirectly in the form of an equitable or beneficial interest) more than 5% of the total assets or capital stock of a business entity (a corporation, partnership, LLC, limited partnership, proprietorship, joint venture, trust, firm, etc., doing business in Florida); **and,**

(2) You received more than 10% of your gross income from that business entity; **and,**

(3) You received more than \$1,500 in gross income from that business entity.

If your interests and gross income exceeded these thresholds, then for that business entity you must list every source of income to the business entity which exceeded 10% of the business entity's gross income (computed on the basis of the business entity's most recently completed fiscal year), the source's address, and the source's principal business activity.

Examples:

— You are the sole proprietor of a dry cleaning business, from which you received more than 10% of your gross income—an amount that was more than \$1,500. If only one customer, a uniform rental company, provided more than 10% of your dry cleaning business, you must list the name of the uniform rental company, its address, and its principal business activity (uniform rentals).

— You are a 20% partner in a partnership that owns a shopping mall and your partnership income exceeded the thresholds listed above. You should list each tenant of the mall that provided more than 10% of the partnership's gross income, and the tenant's address and principal business activity.

PART C — REAL PROPERTY

[Required by s. 112.3145(3)(a)3, F.S.]

In this part, list the location or description of all real property in Florida in which you owned directly or indirectly at any time during the disclosure period in excess of 5% of the property's value. You are not required to list your residences. You should list any vacation homes, if you derive income from them.

Indirect ownership includes situations where you are a beneficiary of a trust that owns the property, as well as situations where you own more than 5% of a partnership or corporation that owns the property. The value of the property may be determined by the most recently assessed value for tax purposes, in the absence of a more current appraisal.

The location or description of the property should be sufficient to enable anyone who looks at the form to identify the property. A street address should be used, if one exists.

PART D — INTANGIBLE PERSONAL PROPERTY

[Required by s. 112.3145(3)(a)3, F.S.]

Describe any intangible personal property that, at any time during the disclosure period, was worth more than 10% of your total assets, and state the business entity to which the property related. Intangible personal property includes things such as cash on hand, stocks, bonds, certificates of deposit, vehicle leases, interests in businesses, beneficial interests in trusts, money owed you, Deferred Retirement Option Program (DROP) accounts, the Florida Prepaid College Plan, and bank accounts. Intangible personal property also includes investment products held in IRAs, brokerage accounts, and the Florida College Investment Plan. Note that the product contained in a brokerage account, IRA, or the Florida College Investment Plan is your asset—not the account or plan itself. Things like automobiles and houses you own, jewelry, and paintings are not intangible property. Intangibles relating to the same business entity may be aggregated; for example, CD's and savings accounts with the same bank.

Calculations: To determine whether the intangible property exceeds 10% of your total assets, total the fair market value of all of your assets (including real property, intangible property, and tangible personal property such as jewelry, furniture, etc.). When making this calculation, do not subtract any liabilities (debts) that may relate to the property. Multiply the total figure by 10% to arrive at the disclosure threshold. List only the intangibles that exceed this threshold amount. The value of a leased vehicle is the vehicle's present value minus the lease residual (a number which can be found on the lease document). Property that is only jointly owned property should be valued according to the percentage of your joint ownership. Property owned as tenants by the entirety or as joint tenants with right of survivorship should be valued at 100%. None of your calculations or the value of the property have to be disclosed on the form.

Example: You own 50% of the stock of a small corporation that is worth \$100,000, the estimated fair market value of your home and other property (bank accounts, automobile, furniture, etc.) is \$200,000. As your total assets are worth \$250,000, you must disclose intangibles worth over \$25,000. Since the value of the stock exceeds this threshold, you should list "stock" and the name of the corporation. If your accounts with a particular bank exceed \$25,000, you should list "bank accounts" and bank's name.

PART E — LIABILITIES

[Required by s. 112.3145(3)(b)4, F.S.]

List the name and address of each creditor to whom you owed any amount that, at any time during the disclosure period, exceeded your net worth. You are not required to list the amount of any debt or your net worth. You do not have to disclose: credit card and retail installment accounts, taxes owed (unless reduced to a judgment), indebtedness on a life insurance policy owed to the company of issuance, or contingent liabilities. A "contingent liability" is one that will become an actual liability only when one or more future events occur or fail to occur, such as where you are liable only as a guarantor, surety, or endorser on a promissory note. If you are a "co-maker" and are jointly liable or jointly and severally liable, it is not a contingent liability.

Calculations: To determine whether the debt exceeds your net worth, total all of your liabilities (including promissory notes, mortgages, credit card debts, judgments against you, etc.). The amount of the liability of a vehicle lease is the sum of any past-due payments and all unpaid prospective lease payments. Subtract the sum total of your liabilities from the value of all your assets as calculated above for Part D. This is your "net worth." List each creditor to whom your debt exceeded this amount unless it is one of the types of indebtedness listed in the paragraph above (credit card and retail installment accounts, etc.). Joint liabilities with others for which you are "jointly and severally liable," meaning that you may be liable for either your part or the whole of the obligation, should be included in your calculations at 100% of the amount owed.

Example: You owe \$15,000 to a bank for student loans, \$5,000 for credit card debts, and \$60,000 (with spouse) to a savings and loan for a home mortgage. Your home (owned by you and your spouse) is worth \$80,000 and your other property is worth \$20,000. Since your net worth is \$20,000 (\$100,000 minus \$80,000), you must report only the name and address of the savings and loan.

PART F — INTERESTS IN SPECIFIED BUSINESSES

[Required by s. 112.3145, F.S.]

The types of businesses covered in this disclosure include: state and federally chartered banks; state and federal savings and loan associations; cemetery companies; insurance companies; mortgage companies; credit unions; small loan companies; alcoholic beverage licensees; pari-mutuel wagering companies, utility companies, entities controlled by the Public Service Commission; and entities granted a franchise to operate by either a city or a county government.

Disclose in this part the fact that you owned during the disclosure period an interest in, or held any of certain positions with, the types of businesses listed above. You are required to make this disclosure if you own or owned (either directly or indirectly in the form of an equitable or beneficial interest) at any time during the disclosure period more than 5% of the total assets or capital stock of one of the types of business entities listed above. You also must complete this part of the form for each of these types of businesses for which you are, or were at any time during the disclosure period, an officer, director, partner, proprietor, or agent (other than a resident agent solely for service of process).

If you have or held such a position or ownership interest in one of these types of businesses, list the name of the business, its address and principal business activity, and the position held with the business (if any). If you own(ed) more than a 5% interest in the business, indicate that fact and describe the nature of your interest.

PART G — TRAINING CERTIFICATION

[Required by s. 112.3142, F.S.]

If you are a Constitutional or elected municipal officer whose service began before March 31 of the year for which you are filing, you are required to complete four hours of ethics training which addresses Article II, Section 8 of the Florida Constitution, the Code of Ethics for Public Officers and Employees, and the public records and open meetings laws of the state. You are required to certify on this form that you have taken such training.

(End of Percentage Thresholds Instructions.)



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ATTORNEYS AT LAW

To: All Pension Clients
From: Klausner Kaufman Jensen & Levinson
Re: CARES Act payments

The new CARES Act provides Americans below a certain income threshold with advance refundable tax credit payments of \$1200 per person or \$2400 for joint filers. Certain taxpayers can also receive an additional payment for children.

The distribution of these federal checks will be based on tax returns or Social Security records. If your plan has members whose benefit level does not require the filing of a tax return, it is highly recommended they immediately file a tax return for 2019. This is particularly important for those who do not receive Social Security. Filers who have \$0 tax liability can file for free at the Internal Revenue Service website. The tools are available at the following link:
<https://www.irs.gov/filing/free-file-do-your-federal-taxes-for-free>

This recommendation is based on our work with NASRA during the drafting of the bill and confirmed by tax practitioners with whom we consulted. In addition, the following recommendation appeared today from Senate Committee on Finance:

“Are seniors whose only income is from Social Security or a veteran whose only income is a veterans’ disability payment eligible? Yes, as long as they are not the dependent of another taxpayer. The bill also provides IRS with additional tools to locate and provide rebates to low-income seniors who normally do not file a tax return by allowing them to base a rebate on Form SSA-1099, Social Security Benefit Statement or Form RRB-1099, which is the equivalent of the Social Security statement for Railroad Employees. However, seniors are still encouraged to file their 2019 tax return to ensure they receive their recovery rebate as quickly as possible.”

For the full report and FAQ from the Finance Committee, please review the following link:

<https://www.finance.senate.gov/chairmans-news/cares-act-recovery-check-faq>

As we have advised, we are fully operational on a remote basis during this crisis and are available to answer your questions.

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MEMORANDUM

To: Board of Trustees

From: Klausner, Kaufman, Jensen and Levinson

Subject: Continued Guidance on the Families First Coronavirus Response Act (FFCRA) and the CARES Act

Date: April 27, 2020

FAMILIES FIRST CORONAVIRUS RESPONSE ACT (FFCRA): GROUP HEALTH PLANS AND HEALTH INSURANCE COVERAGE

§3201 (CARES)

- Section 3201 of the CARES Act amended section 6001 of the FFCRA to include a broader range of diagnostic items and services that plans and issuers must cover without any cost-sharing requirements or prior authorization or other medical management requirements.

§6001 (FFCRA)

- Section 6001 of the FFCRA applies to group health plans¹ and health insurance issuers offering group or individual health insurance coverage (including grandfathered health plans as defined in section 1251(e) of the Patient Protection and 25 U.S.C. § 553(b)(B) and (d)(3). Does NOT apply to group health plans that do not cover at least two employees who are current employees (such as plans in which only retirees participate).
- Requires group health plans and health insurance issuers offering group or individual health insurance coverage to provide benefits for certain items and services related to diagnostic testing for the detection of SARS-CoV-2 or the

¹The term "group health plan" includes both insured and self-insured group health plans. It includes private employment-based group health plans (ERISA plans), non-federal governmental plans (such as plans sponsored by states and local governments), and church plans.

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diagnosis of COVID-19 (referred to collectively in this document as COVID-19), as determined by the individual's attending healthcare provider in accordance with accepted standards of current medical practice, when those items or services are furnished on or after March 18, 2020, and during the applicable emergency period².

- Plans and issuers must provide this coverage without imposing any cost-sharing requirements (including deductibles, copayments, and coinsurance) or prior authorization or other medical management requirements.

REQUIRED COVERAGE:

- Coverage must be provided for the following items and services:

(1) An in vitro diagnostic test as defined in section 809.3 of title 21, Code of Federal Regulations, for the detection of SARS-CoV-2 or the diagnosis of COVID-19, and the administration of such a test, that—

A. Is approved, cleared, or authorized under section 510(k), 513, 515, or 564 of the Federal Food, Drug, and Cosmetic Act (21 U.S.C. §§ 360(k), 360c, 360e, 360bbb3);

B. The developer has requested, or intends to request, emergency use authorization under section 564 of the Federal Food, Drug, and Cosmetic Act (21 U.S.C. 360bbb–3), unless and until the emergency use authorization request has been denied or the developer of such test does not submit a request within a reasonable timeframe;

C. Is developed in and authorized by a State that has notified the Secretary of HHS of its intention to review tests intended to diagnose COVID–19; or

D. Other tests that the Secretary of HHS determines appropriate in guidance.

² Generally, under section 319 of the Public Health Service (PHS) Act, a public health emergency declaration lasts until the Secretary of HHS declares that the public health emergency no longer exists, or upon the expiration of the 90-day period beginning on the date the Secretary declared a public health emergency exists, whichever occurs first. The Secretary may extend the public health emergency declaration for subsequent 90-day periods for as long as the public health emergency continues to exist, and may terminate the declaration whenever he determines that the public health emergency has ceased to exist. Unless extended or terminated earlier, the public health emergency related to COVID-19 is effective through April 25, 2020.

(2) Items and services furnished to an individual during healthcare provider office visits (which includes in-person visits and telehealth visits), urgent care center visits, and emergency room visits that result in an order for or administration of an in vitro diagnostic product described in paragraph (1), but only to the extent the items and services relate to the furnishing or administration of the product or to the evaluation of the individual for purposes of determining the need of the individual for such product.

- Plans and issuers are required to provide coverage for items and services that are furnished by providers that have not agreed to accept a negotiated rate as payment in full (i.e., out-of-network providers).

1. If the plan or issuer has a negotiated rate with such provider in effect before the public health emergency declared under section 319 of the PHS Act, such negotiated rate shall apply throughout the period of such declaration.

2. If the plan or issuer does not have a negotiated rate with such provider, the plan or issuer shall reimburse the provider in an amount that equals the cash price for such service as listed by the provider on a public internet website, or the plan or issuer may negotiate a rate with the provider for less than such cash price.

- The term “visit” includes both traditional and non-traditional care settings in which a COVID-19 diagnostic test is ordered or administered, including COVID-19 drive-through screening and testing sites where licensed healthcare providers are administering COVID-19 diagnostic testing.

PLAN AMENDMENTS:

- Plans and issuers are permitted to amend the terms of a plan or coverage to add benefits, or reduce or eliminate cost sharing, for the diagnosis and treatment of COVID-19 prior to satisfying any applicable notice of modification requirements and without regard to otherwise applicable restrictions on mid-year changes to health insurance coverage.

- If a plan or issuer makes a material modification (as defined under section 102 of ERISA) in any of the terms of the plan or coverage, to include telehealth coverage, that would affect the content of the SBC that is not reflected in the most recently provided SBC, and that occurs other than in connection with a renewal or reissuance of coverage, the plan or issuer must provide notice of the modification

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to enrollees not later than 60 days prior to the date on which the modification will become effective, or as soon as reasonably practicable. They may either provide an updated SBC reflecting the modification or provide a separate notice describing the material modifications.

- If a plan or issuer maintains any such changes beyond the emergency period, plans and issuers must comply with all other applicable requirements to update plan documents or terms of coverage.

****States may impose additional standards or requirements on health insurance issuers with respect to the diagnosis or treatment of COVID-19, to the extent that such standards or requirements do not prevent the application of a federal requirement.**

EXCEPTED BENEFITS and EAP's:

Background:

Sections 2722 and 2763 of the PHS Act, section 732 of ERISA, and section 9831 of the Code provide that the respective requirements of title XXVII of the PHS Act, part 7 of ERISA, and Chapter 100 of the Code generally do not apply to the provision of certain types of benefits, known as "excepted benefits." Under section 2791(c)(1) of the PHS Act, section 733(c)(1) of ERISA, and section 9832(c)(1) of the Code, benefits that are generally not health coverage, including on-site medical clinics, are excepted benefits.

Limited excepted benefits, which may include limited scope vision or dental benefits, and benefits for long-term care, nursing home care, home healthcare, or community-based care are excepted only if certain conditions are met. Section 2791(c)(2)(C) of the PHS Act, section 733(c)(2)(C) of ERISA, and section 9832(c)(2)(C) of the Code authorize the Secretaries of HHS, Labor, and the Treasury (collectively, the Secretaries) to issue regulations establishing other, similar limited benefits as excepted benefits. The Secretaries exercised this authority previously with respect to certain employee assistance programs (EAPs).

- EAP's are excepted if they satisfy all of the following requirements:

(A) The EAP does not provide significant benefits in the nature of medical care. For this purpose, the amount, scope and duration of covered services are taken into account.

(B) The benefits under the EAP are not coordinated with benefits under another group health plan:

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(1) Participants in the other group health plan must not be required to use and exhaust benefits under the EAP (making the EAP a gatekeeper) before an individual is eligible for benefits under the other group health plan; and

(2) Participant eligibility for benefits under the EAP must not be dependent on participation in another group health plan.

(C) No employee premiums or contributions are required as a condition of participation in the EAP.

(D) There is no cost sharing under the EAP.

- The Departments' final regulations provide that for the purpose of determining whether an EAP provides benefits that are significant in the nature of medical care, the amount, scope, and duration of covered services are taken into account.

- An EAP will not be considered to provide benefits that are significant in the nature of medical care solely because it offers benefits for diagnosis and testing for COVID-19 while a public health emergency declaration under section 319 of the PHS Act related to COVID-19 or a national emergency declaration under the National Emergencies Act,²⁶ related to COVID-19 is in effect.

- Benefits offered by an employer under an EAP for diagnosis and testing for COVID-19 at an on-site medical clinic will constitute an excepted benefit in all circumstances .

****Note** that guidance concerning the application of the FFCRA and the CARES Act continues to be updated frequently. This memo represents our considered view as of the date issued to the proper application after reviewing the Act and available resources.

****FAQ's** prepared jointly by the Department of Labor (DOL), Health and Human Services (HHS), and the Treasury are available at: <https://www.dol.gov/agencies/ebsa/laws-and-regulations/laws/affordable-care-act/for-employers-and-advisers/aca-implementation-faqs> and www.cms.gov/ccio/resources/fact-sheets-and-faqs/index.html.

If you have any questions, email Bonni Jensen (bonni@robertdklausner.com) or Bob Klausner (bob@robertdklausner.com). This memo will be posted on our website, <https://klausnerkaufman.com> and will be updated as additional guidance becomes known.