

**Act 44 Disclosure of Information for Professional Service Provider to
Borough of Grove City Municipal Pension System
Professional Service Provider: PNC Bank Institutional Investment Group**

Identify the Municipal Pension System(s) for which you are providing information:

Non-Uniform Plan _____

Administrative Plan _____

Police Plan X

REF #

1.	<p>PNC Bank Institutional Investment Group:</p> <p><u>Lorna Kinzler</u>, Account Administrator:</p> <ul style="list-style-type: none"> • Provides daily contact with client regarding administration of account • Facilitates pension disbursements • Coordinates in-flows and out-flows of cash • Provides audit support <p><u>Joyce Frydryck</u>, Team Leader:</p> <ul style="list-style-type: none"> • Leadership oversight of Account Administrator including problem resolution, product development, and project management. <p><u>Steve Shapiro</u>, Portfolio Manager:</p> <ul style="list-style-type: none"> • Meets with clients to ensure their needs are being met • Introduces new products and services that will add value for client • Consults with clients to develop or enhance investment policy guidelines • Determines allocation strategy with client • Monitors blend and sector allocation continuously • Provides quarterly investment management reports and commentary • Provides direct line to client for portfolio strategy discussion or performance analysis • Attends board meetings when requested. <p>The following individuals provide managerial oversight of the individuals listed above:</p> <ul style="list-style-type: none"> • Mark Leib Vice President - Managing Director • Peter Ferrise Senior Vice President
2.	<p>PNC Bank Institutional Investment Group: The individuals below have managerial oversight over the services provided by PNC Institutional Investments for the Plan.</p> <p>Robert Reilly Executive Vice President, Asset Management Group Kevin McCreddie Executive Vice President, President of PNC Capital Advisors James Dunigan Executive Vice President, Investment Strategy</p>
3.	No
4.	No
5.	PNC does not retain or pay any third party to deal with any representatives of the municipal pension system. PNC does engage legal counsel from time to time to represent it in discussions with legal counsel to the municipal pension system.
6.	<p>PNC has taken the following action to identify information in response to this question. It is possible that some information would not have been identified through this action, but PNC believes in the circumstances that this action constitutes a good faith effort.</p> <p>A survey was completed by the employees listed in Item 1 above. Per responses to the survey and according to our records, no solicitation of contributions were made by PNC nor by these employees since December 17, 2009, to any municipal official or candidate for municipal office in Borough Grove City, or to the political party or political actions committee of an official or candidate.</p>

7. According to our records, since December 17, 2009 no contributions by PNC or any affiliated entity were made to any municipal official or candidate for municipal office in Borough of Grove City.
8. No except for customary banking relationships (checking and savings accounts, investment accounts, loans, trust accounts, etc.) with employees and officials of the municipal pension system.
9. Information is collected by PNC (not including National City entities acquired in December 2008) in the normal course of its business, which until December 17, 2009 required pre-clearance by PNC by any employee of any gifts in excess of \$100 provided to an official or employee of the municipal pension system or the municipality which controls the municipal pension system. On December 17, 2009, the policy was changed to require pre-clearance by PNC of any gift by an employee to an official or employee of the municipal pension system or the municipality which controls the municipal pension system.

Information disclosed prior the policy change effective December 17, 2009 is as follows:

Name of Person Providing Gift	Name of Person Receiving Gift	Title of Person Receiving Gift	Gift/Value	Date Provided
Steven Shapiro on behalf of PNC	Vance Oakes	Borough Manager	Meal/\$18	10/18/2007
Steven Shapiro on behalf of PNC	Paris Weiland	Borough Secretary	Meal/\$18	10/18/2007
Steven Shapiro on behalf of PNC	Vance Oakes	Borough Manager	Meal/\$15	12/12/2008

Per our records and as reported in a survey of the employees who are directly responsible for dealing with the municipal pension system and of their supervisors up through the executive management of PNC Institutional Investment Group, no gifts were provided to an official or employee of the municipal pension system or the municipality which controls the municipal pension system, specifically, those listed on the "List of Municipal Officials", after December 17, 2009.

10. PNC has taken the following action to identify information for the following reports. It is possible that some information would not have been identified through these actions, but PNC believes in the circumstances that this action constitutes a good faith effort.
- For reporting of political contributions made prior to the implementation of PA Act 44 on December 17, 2009, PNC is providing the report entitled *PA Contributions 2006-2009*. This report reflects all contributions for 2006-2009 previously reported by PNC as to its directors and officers under the provisions of the Pennsylvania Election Code (25 P.S. § 3260a). This includes contributions of \$1,000 or greater by PNC officers designated under Regulation O of the Board of Governors of the Federal Reserve System (12 C.F.R. 215) and directors.
- For reporting of political contributions after the implementation of PA Act 44 on December 17, 2009, PNC is providing the report entitled *PA Contributions 2010*. This report reflects all contributions of at least \$500 (singly or in the aggregate) made in 2010 by an officer, director, Executive-Level Employee or owner of at least 5% of the firm or an Affiliate Entity to any candidates for public office or the holders of such offices in the Commonwealth and to any political committees of such candidates or office holders
- Note that PNC officer is defined as designated under Regulation O of the Board of Governors of the Federal Reserve System (12 C.F.R. 215).
11. PNC has taken the following action to identify information in response to this question. It is possible that some information would not have been identified through this action, but PNC believes in the circumstances that this action constitutes a good faith effort.
- A survey was completed by the employees listed in Item 1 above. Per responses to the survey, and according to our records, no apparent, potential or actual conflicts of interest exist.
12. No additional information to disclose.

Please provide the name(s) and position(s) of the person(s) participating in the completion of this Disclosure.

One of the individuals identified by the **Contractor in Item #1** above must participate in completing this Disclosure and must sign the below verification attesting to the participation of those individuals named below.

Name: Thomas Vail

Name: Joyce Frydryck

Position: Corporate Ethics Manager

Position: Team Leader

Name: Lorna Kinzler

Name:

Position: Account Administrator

Position:



SIGNATURE

Corporate Ethics Manager

TITLE

11-9-2011

DATE

VERIFICATION

I, Joyce A. Frydryck hereby state that I am VP, Group Leader for
(Name) (Position)

PNC Bank Institutional Investment Group and I am authorized to make this verification.
(Contractor)

I hereby verify that the facts set forth in the foregoing Act 44 Disclosure Form for Entities Providing Professional Services to Borough of Grove City Pension System are true and correct to the best of my knowledge, information and belief. I also understand that knowingly making material misstatements or omissions in this form could subject the responding Contractor to the penalties in Section 70S-A (e) of Act 44.

I understand that false statements herein are made subject to the penalties of 18 P.A.C.S. § 4904 relating to unsworn falsification to authorities.

Joyce A. Frydryck
Signature

11-9-11
Date