

January 7, 2009

Edward D. Ryan
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re: NASDAQ OMX Group PAC (C00366013)

Dear Mr. Ryan:

We are in receipt of your Request for Additional Information ("RFAI") dated December 12, 2008. This letter is in response to the RFAI requesting clarification regarding activity disclosed on the amended 12 Day Missouri Pre-Primary report and, per your conversation on December 18, 2008 with Carrie Hoback, also addresses questions regarding the October Quarterly report.

12 Day Missouri Pre-Primary:

While preparing the Post-General report, for our client, NASDAQ OMX Group, we discovered an administrative error that resulted in the inadvertent omission of several receipts on the 12 Day Missouri Pre-Primary report. The receipts consisted of two checks totaling \$10,000 and one payroll contribution of \$86.73. (The RFAI quotes to receipts of \$10,086.73. The correct amount should be \$10,086.73.) The two checks were placed in the administrative file in preparation for the report but were overlooked by the report preparer who mistakenly assumed that the checks had been reported on a previous filing. The payroll contribution was omitted because of a data entry oversight. All contributions to candidates were accurately disclosed. The original report was filed in good-faith and, as soon as we discovered our error, we took corrective action to accurately disclose the receipts by filing an amended 12 Day Missouri Pre-Primary report.

October Quarterly Report:

The October Quarterly report was filed timely on October 13, 2008. On December 4, 2008, an amended report was filed disclosing an additional \$2,953.22 in receipts. The report preparer neglected to notice that the September payroll deductions consisting of \$2,953.22 had been omitted from the report. Similar to the 12 Day Missouri Pre-Primary report, the omission was discovered while preparing the Post-General report. The omission of the September payroll contributions prompted us to review reports that had been filed to ensure accuracy and completeness. This review discovered the omission in the 12 Day Missouri Pre-Primary, which, as discussed above, was amended at the same time.

Corrective Measures:

1. NASDAQ PAC's filings have been reviewed for accuracy and completeness with amended reports filed where necessary.
2. Amendments to the 12 Day Pre-Primary and October Quarterly reports have been filed.
3. Pursuant to the December 18, 2008 conversation, and per your request, the 12 Day Pre-Primary and October Quarterly reports have been amended to cross reference Form 99 filed in connection with this matter.
4. We have instituted additional internal measures such as a checklist to make sure all relevant documentation, such as

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payroll records, has been recorded. Also, at the completion of each report, a memo to the file will summarize the information disclosed in that report as well as label each document for which a report has been filed. These measures address the omission of the checks, which were in the file but mistakenly omitted, as well as making sure all relevant documents, such as payroll records, are in hand.

After an extensive and thorough review of the PAC's files, we are confident that the public record now accurately reflects the PAC's activities.

We have worked diligently to correct any mistakes made and all amendments were made prior to inquiry by the FEC. We appreciate your assistance on this matter. Please do not hesitate to contact me if you have additional questions.

Sincerely,

Melissa Laurenza
