

September 20, 2011

Ms. Andrea Needles
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street NW
Washington, DC 20463

Dear Ms. Needles:

This letter provides additional background information regarding four amended reports that are being filed by the GlaxoSmithKline PAC (GSK PAC) today. The May 20, 2011 Monthly Report; June 20, 2011 Monthly Report; July 20, 2011 Monthly Report; and August 20, 2011 Monthly Report have been amended in order to correct two inadvertent errors that GSK PAC discovered late last week. These items were discovered by our recently-hired compliance vendor in the course of reviewing reports that had been prepared and filed by the previous compliance vendor. Our new vendor began providing services to GSK PAC on September 1, 2011.

The first item involved the misreporting of the contribution date for payroll deductions which, in one instance, resulted in a contribution that was deducted from employees' pay in one month being reported in the subsequent month. This error affected the May 20, 2011 Monthly Report and the June 20, 2011 Monthly Report because one payroll from April 29, 2011 that should have been reported in the May 20 report was inadvertently reported on the June 20 report. This error did not result in an overall increase or decrease in reported activity. We have corrected the reports to disclose the correct dates of the contributions.

The second item involved the omission of one payroll in May, which should have been reported on the June 20 report. The contributions that should have been reported from this payroll totaled \$22,030.63 and the amended June 20 report reflects an increase in that amount that is carried through to the amended July and August reports. With the filing of these amended reports, we believe the public record of GSK PAC's activities is complete and accurate.

GSK PAC strives to meet all federal reporting obligations and conducts monthly bank reconciliations and reviews by PAC staff and outside counsel. We regret these clerical errors and, as indicated above, have hired a new compliance vendor to assist GSK PAC in order to avoid such accidental errors and omissions in the future.

We trust the amended reports and this explanatory letter clarifies the public record. If there are any other questions, please do not hesitate to contact me.

Sincerely,

Mark J. Santry
Treasurer
