

Response to FEC Inquiry dated May 11, 2011

Reference: Year End Report 7/01/2009 - 12/31/2009

Dear Sir or Madam:

Regarding Payroll expenditures on Schedule H4, supporting line 21(a) of our report, the percentage of Federal Election Activity was less than 25% of the total expenditure.

Therefore, the reporting of the payroll on line 21(a) - Shared Federal / Non-Federal Activity is correct and reimbursement from the non-federal account is allowed.

An amended filing has been submitted with memo text explanation.