Congress of the United States
House of Representatives
Washington, DC 20515

August 14, 2012

Mr. Michael T. Duke
Chief Executive Officer
Wal-Mart Stores, Inc.
702 SW 8th Street
Bentonville, AR 72716

Dear Mr. Duke:

We are writing to give you a final opportunity to respond to our requests for information about allegations that your company violated the Foreign Corrupt Practices Act. Although you have stated on multiple occasions that you intend to cooperate with our investigation, you have failed to provide the documents we requested, and you continue to deny us access to key witnesses. Your actions are preventing us from assessing the thoroughness of your internal investigation and from identifying potential remedial actions.

During the course of our investigation, we have learned that Wal-Mart's concerns about potential violations of the Foreign Corrupt Practices Act are not limited to operations in Mexico, but are global in nature. Your outside counsel informed us that, before allegations of bribery in Mexico became public, Wal-Mart retained attorneys to conduct a broad review of the company's anti-corruption policies. This review identified five "first tier" countries "where risk was the greatest." Wal-Mart then conducted a worldwide assessment of the company's anti-corruption policies, culminating in a series of recommendations and policy changes based on those findings.

In addition, we have obtained internal company documents, including internal audit reports, from other sources suggesting that Wal-Mart may have had compliance issues relating not only to bribery, but also to "questionable financial behavior" including tax evasion and money laundering in Mexico.

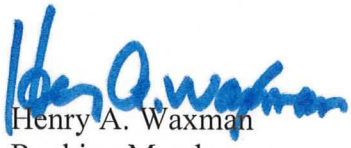
To date, however, you have not produced a single document we have requested. You have refused to provide Committee staff with copies of any internal reports or specific information about the findings and recommendations of your worldwide assessment. You have refused to provide access to Maritza Munich, Wal-Mart International's former General Counsel. Indeed, you have not allowed us to speak to any Wal-Mart employees responsible for compliance with the Foreign Corrupt Practices Act.

With respect to Wal-Mart's ongoing internal investigation of violations of the Foreign Corrupt Practices Act, your attorneys have not identified a single senior Wal-Mart manager who has been interviewed, they have not provided any timeline for its conclusion, and they have not described its scope in any detail, stating only that it is not limited to "any particular allegations."

We would like to give you an opportunity to respond to allegations against your company before releasing any investigative report and before making public any documents we have obtained as part of the investigation. For these reasons, we ask that you comply with our previous requests for documents and briefings by August 28, 2012. Please contact Una Lee of the Oversight and Government Reform Committee staff at (202) 225-5051 or Tiffany Benjamin of the Energy and Commerce Committee staff at (202) 226-3400 with any questions about this request.

Sincerely,

Elijah E. Cummings
Ranking Member
Committee on Oversight and
Government Reform



Henry A. Waxman
Ranking Member
Committee on Energy and
Commerce

cc: The Honorable Darrell E. Issa, Chairman
Committee on Oversight and Government Reform

The Honorable Fred Upton, Chairman
Committee on Energy and Commerce