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May 8, 2012

The Honorable Elijah E. Cummings  
Ranking Member  
Committee on Oversight & Government Reform  
U.S. House of Representatives  
Washington, DC 20515

The Honorable Henry A. Waxman  
Ranking Member  
Committee on Energy & Commerce  
U.S. House of Representatives  
Washington, DC 20515

Dear Ranking Members Cummings and Waxman:

The purpose of this letter is to respond to your April 25, 2012 letter asking for information on "Wal-Mart's role in efforts to lobby for changes to" the Foreign Corrupt Practices Act (FCPA).

At the outset, please note that, the Retail Industry Leaders Association (RILA) is a trade association with a broad and diverse membership. Like many other trade and professional associations, societies, and unions, we serve our membership by communicating with policymakers on dozens of issues affecting our members, their employees, and their customers. We advocate for our members' common interests, representing them collectively and not individually. Our efforts are never driven by the agenda of any one member. Accordingly, RILA is not the proper source for information on any one of our members' efforts or activities with respect to any issue.

Nonetheless, in the spirit of cooperation, we share with you the following information requested in your letter.

We are aware of no "RILA members, senior officials and staff who have worked on issues related to the FCPA and have been or currently are affiliated with Wal-Mart or any of its subsidiaries or affiliates over the past ten years." Accordingly, we have no communication with any such individuals.

Moreover, RILA has never lobbied to amend the FCPA. As you know, RILA participated in a dialogue with the U.S. Department of Justice and the Securities and Exchange Commission regarding guidance that those agencies announced last fall that they would issue. In announcing the forthcoming guidelines, Assistant Attorney General Lanny A. Breuer said that he has "come to appreciate very much the continuing dialogue [his] team and [he had] been having with the private sector." RILA believes that adherence to the law is essential and that further clarity and predictability regarding FCPA enforcement will help to ensure such compliance. Accordingly, RILA signed on to a multi-trade association letter requesting a meeting and participated in the subsequent meeting.

We trust that you will find this letter fully responsive to your request. Any future correspondence regarding this matter should be directed to me at the address above.

Sincerely,

A handwritten signature in black ink that reads "Sandra Kennedy". The signature is fluid and cursive, with a long, sweeping underline that extends to the left.

Sandra Kennedy  
President

cc: The Honorable Darrell E. Issa, Chairman  
The Honorable Fred Upton, Chairman