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

April 25, 2012

Mr. Gregg Steinhafel
Chairman
Board of Directors
Retail Industry Leaders Association
1700 N. Moore Street, Suite 2250
Arlington, VA 22209

Dear Mr. Steinhafel:

On April 21, 2012, the New York Times published an article detailing the results of its investigation into allegations that top Wal-Mart executives "orchestrated a campaign of bribery to win market dominance" in Mexico.[1] If true, these allegations raise serious questions regarding Wal-Mart's compliance with the Foreign Corrupt Practices Act (FCPA), a law which makes it illegal to bribe foreign government officials.

This morning, the Washington Post ran a front-page story reporting that Wal-Mart "has participated in an aggressive and high-priced lobbying campaign to amend the long-standing U.S. anti-bribery law that the company may have violated."[2] According to the story, this campaign was backed by several companies and trade groups, including the Retail Industry Leaders Association. Your website indicates that Bill Simon, President and Chief Executive Officer of Wal-Mart U.S., serves on your Board of Directors.[3]

We are concerned about the role that Wal-Mart officials may have played in the efforts to modify the FCPA. It would appear to be a conflict of interest for Wal-Mart officials to advise on ways to weaken the FCPA at a time when the leadership of the company was apparently aware of corporate conduct that may have violated the law.

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[1] *Vast Mexico Bribery Case Hushed Up by Wal-Mart After Top-Level Struggle*, New York Times (Apr. 21, 2012) (online at www.nytimes.com/2012/04/22/business/at-wal-mart-in-mexico-a-bribe-inquiry-silenced.html?_r=2).

[2] *Wal-Mart Aided Lobbying on Bribery Law*, Washington Post (Apr. 25, 2012).

[3] Retail Industry Leaders Association, *Board of Directors* (accessed on Apr. 24, 2012) (online at www.rila.org/about/leadership/bod/Pages/default.aspx).

To assist our committees in better understanding Wal-Mart's role in efforts to lobby for changes to the FCPA, please provide the following information and documents:

1. A list of all Retail Industry Leaders Association 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;

2. All internal and external communications involving the individuals identified in response to Question 1 relating to the FCPA, including any communications about attempts to change provisions of the law or to repeal it;

3. All communications about the FCPA or any other U.S. anti-bribery laws between individuals affiliated with the Retail Industry Leaders Association and Wal-Mart officials, employees, or agents; and

4. All documents, including communications, relating to the actions of Wal-Mart in lobbying for changes to the FCPA or any other U.S. anti-bribery laws.

Please provide these documents by May 9, 2012. If you have any questions about this request, please contact Una Lee of the Oversight Committee staff at (202) 225-5051 or Tiffany Benjamin of the Energy and Commerce Committee staff at (202) 226-3400.

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