

FORM LM-21

RECEIPTS AND DISBURSEMENTS REPORT

This report is mandatory under P.L. 86-257, as amended. Failure to comply may result in criminal prosecution, fines, or civil penalties as provided by 29 U.S.C. 439 or 440.
Required of persons, including Labor Relations Consultants and Other Individuals and Organizations, Under section 203(b) of the Labor-Management Relations and Disclosure Act of 1959, as amended. (LMRDA)



READ THE INSTRUCTIONS CAREFULLY BEFORE PREPARING THIS REPORT

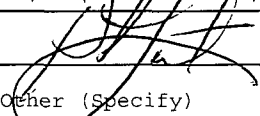
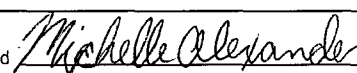
479446

1. File Number C- 00322	2. Period Covered By This Report From:	Month/Day/Year (mm/dd/yyyy) 01 / 01 / 2011	Through:	Month/Day/Year (mm/dd/yyyy) 12 / 31 / 2011
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A. Person Filing	
3. Name and mailing address (include ZIP Code): Name Peter List Title Founder & CEO Organization Kulture Consulting, LLC P.O. Box, Building and Room Number, if any Street 759 Bloomfield Avenue, #301 City West Caldwell State New Jersey ZIP Code + 4 07006	4. Any other address where records necessary to verify this report are kept: Name Peter List Title Founder & CEO Organization Kulture Consulting, LLC P.O. Box, Building and Room Number, if any Street 305 Eisenhower Parkway City Livingston State New Jersey ZIP Code + 4 07039

Signatures

Each of the undersigned declares, under penalty of perjury and other applicable penalties of law, that all of the information submitted in this report (including the information contained in any accompanying documents) has been examined by the signatory and is, to the best of the undersigned's knowledge and belief, true, correct, and complete. (See the Section on penalties in the instructions).

17. Signed  Title Other (Specify) Founder & CEO On 3/15/2012 973-403-9901 Date Telephone Number	President (if other title, see instructions)	18. Signed  Title Other (Specify) Manager of Administration On 3/15/2012 973-403-9901 Date Telephone Number	Treasurer (If other title, see instructions)
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Name of Person Filing: Peter List	File Number C- 00322
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B. Statement of Receipts Report all receipts from employers in connection with labor relations advice or services regardless of the purposes of the advice or services.	
5.a. Name and Address of Employer (including trade name, if any).	Mailing Address: P.O. Box, Building and Room Number, if any
Employer High Penn Oversight, L.P.	
Trade Name	Street 900 North Michigan Ave., Ste. 1900
Attention To Paul Seeman	City Chicago
Title	State Illinois ZIP Code + 4 60611
5.b. Termination Date 11/17/2010	5.c. Amount 42,580
6. TOTAL RECEIPTS FROM ALL EMPLOYERS 2,195,046	

C. Statement of Disbursements Report all disbursements made by the reporting organization in connection with labor relations advice or services rendered to the employers listed in Part B.				
7. Disbursements to Officers and Employees:				
(a) Name	(b) Salary	(c) Expenses	(d) Totals	
				9. Office and Administrative Expenses
				10. Publicity
				11. Fees for Professional Services
				12. Loans Made
				13. Other Disbursements
8. Total disbursements to officers and employees:				14. Total Disbursements (Sum of Items 8-13)

D. Schedule of Disbursements for Reportable Activity		Use this Schedule to report only disbursements made for the purposes described in Part D of the instructions.
15.a. Employer Name: Kulture, LLC	15.b. Trade Name, If any:	
15.c. To Whom Paid	15.d. Amount 2,195,046	
Name	15.e. Purpose	
Title	Disbursements were made to the Officers, Consultants, and employees of Kulture, LLC for the purpose of Labor Relations, Employee Relations, and Human Resources services, advice and expenses. (See Addendums)	
Organization		
P.O. Box, Building and Room Number, if any		
Street 759 Bloomfield Avenue, #301		
City West Caldwell		
State New Jersey ZIP Code + 4 07006		
16. TOTAL DISBURSEMENTS FOR ALL REPORTABLE ACTIVITY 2,195,046		

Name of Person Filing: Peter List	File Number C- 00322
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B. Statement of Receipts Report all receipts from employers in connection with labor relations advice or services regardless of the purposes of the advice or services.

<p>5.a. Name and Address of Employer (including trade name, if any).</p> <p>Employer United Natural Foods, Inc.</p> <p>Trade Name</p> <p>Attention To: Joseph J Traficanti</p> <p>Title</p>	<p>Mailing Address:</p> <p>P.O. Box, Bldg., Room No., if any</p> <p>Street 313 Iron Horse Way</p> <p>City Providence</p> <p>State Rhode Island ZIP Code + 4 02908</p>
5.b. Termination Date 11/12/2010	5.c. Amount 106,850

<p>5.a. Name and Address of Employer (including trade name, if any).</p> <p>Employer American Christmas</p> <p>Trade Name</p> <p>Attention To: Fred Schwan</p> <p>Title</p>	<p>Mailing Address:</p> <p>P.O. Box, Bldg., Room No., if any</p> <p>Street 30 Warren Place</p> <p>City New York</p> <p>State New York ZIP Code + 4 10550</p>
5.b. Termination Date 12/6/2010	5.c. Amount 5,305

<p>5.a. Name and Address of Employer (including trade name, if any).</p> <p>Employer Consulate Health Care of Lake Parker</p> <p>Trade Name</p> <p>Attention To: Stephanie Rosenberg</p> <p>Title</p>	<p>Mailing Address:</p> <p>P.O. Box, Bldg., Room No., if any</p> <p>Street 2020 W. Lake Parker Drive</p> <p>City Lakeland</p> <p>State Florida ZIP Code + 4 33805</p>
5.b. Termination Date 2/26/2011	5.c. Amount 73,446

<p>5.a. Name and Address of Employer (including trade name, if any).</p> <p>Employer Interline Brands</p> <p>Trade Name</p> <p>Attention To: Annette Riccuiti</p> <p>Title</p>	<p>Mailing Address:</p> <p>P.O. Box, Bldg., Room No., if any</p> <p>Street 200 E. Park Drive, Suite 200</p> <p>City Moorestown</p> <p>State New Jersey ZIP Code + 4 08054</p>
5.b. Termination Date 3/9/2011	5.c. Amount 27,501

<p>5.a. Name and Address of Employer (including trade name, if any).</p> <p>Employer Franklin Square, L.P.</p> <p>Trade Name dba Kuhn's Market</p> <p>Attention To: Norma Gamrat</p> <p>Title</p>	<p>Mailing Address:</p> <p>P.O. Box, Bldg., Room No., if any</p> <p>Street 700 Beulah Road</p> <p>City Turtle Creek</p> <p>State Pennsylvania ZIP Code + 4 15145</p>
5.b. Termination Date 3/18/2011	5.c. Amount 17,037

<p>5.a. Name and Address of Employer (including trade name, if any).</p> <p>Employer Indian Valley Bulk Carriers</p> <p>Trade Name</p> <p>Attention To: Walter Kontra</p> <p>Title</p>	<p>Mailing Address:</p> <p>P.O. Box, Bldg., Room No., if any</p> <p>Street 74 Ridge Road</p> <p>City Tylersport</p> <p>State Pennsylvania ZIP Code + 4 18971</p>
5.b. Termination Date 4/14/2011	5.c. Amount 70,211

Name of Person Filing: Peter List	File Number C- 00322
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B. Statement of Receipts Report all receipts from employers in connection with labor relations advice or services regardless of the purposes of the advice or services.	
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5.a. Name and Address of Employer (including trade name, if any). Employer Redner's Warehouse Markets Trade Name Attention To: Robert McDonough Title	Mailing Address: P.O. Box, Bldg., Room No., if any Street 3 Quarry Road City Reading State Pennsylvania ZIP Code + 4 19605
5.b. Termination Date 4/25/2011	5.c. Amount 87,119

5.a. Name and Address of Employer (including trade name, if any). Employer Northeast Electrical Distributors Trade Name Attention To: Kathleen O'Rourke Title	Mailing Address: P.O. Box, Bldg., Room No., if any Street 560 Oak Street City Brockton State Massachusetts ZIP Code + 4 02301
5.b. Termination Date 4/27/2011	5.c. Amount 13,016

5.a. Name and Address of Employer (including trade name, if any). Employer Sims Recycling Solutions Trade Name Attention To: Marie Burke Title	Mailing Address: P.O. Box, Bldg., Room No., if any Street 1600 Harvester Road City West Chicago State Illinois ZIP Code + 4 60185
5.b. Termination Date 5/5/2011	5.c. Amount 2,201

5.a. Name and Address of Employer (including trade name, if any). Employer Strategic Resources, Inc. Trade Name Attention To: Anita Lawson Title	Mailing Address: P.O. Box, Bldg., Room No., if any Street 7927 Jones Beach Drive, Ste. 600 W City McLean State Virginia ZIP Code + 4 22102
5.b. Termination Date 5/13/2011	5.c. Amount 13,508

5.a. Name and Address of Employer (including trade name, if any). Employer Coca-Cola Refreshments Trade Name Attention To: Brian Sasadu Title	Mailing Address: P.O. Box, Bldg., Room No., if any Street 2500 Windy Ridge Parkway City Atlanta State Georgia ZIP Code + 4 30339
5.b. Termination Date 6/9/2011	5.c. Amount 165,374

5.a. Name and Address of Employer (including trade name, if any). Employer Central Park Boathouse Trade Name Attention To: Dean J Poll Title	Mailing Address: P.O. Box, Bldg., Room No., if any Street 72nd Street and Park Drive N. City New York State New York ZIP Code + 4 10028
5.b. Termination Date 6/21/2011	5.c. Amount 35,042

Name of Person Filing: Peter List	File Number C- 00322
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B. Statement of Receipts Report all receipts from employers in connection with labor relations advice or services regardless of the purposes of the advice or services.

<p>5.a. Name and Address of Employer (including trade name, if any).</p> <p>Employer Penn National Gaming</p> <p>Trade Name Hollywood Casino (Aurora, IL)</p> <p>Attention To: Gene Clark</p> <p>Title</p>	<p>Mailing Address:</p> <p>P.O. Box, Bldg., Room No., if any</p> <p>Street 825 Berkshire Boulevard</p> <p>City Wyomissing</p> <p>State Pennsylvania ZIP Code + 4 19610</p>
5.b. Termination Date 7/3/2011	5.c. Amount 68,923

<p>5.a. Name and Address of Employer (including trade name, if any).</p> <p>Employer Party Rental (Teterboro)</p> <p>Trade Name</p> <p>Attention To: Gary Halperin</p> <p>Title</p>	<p>Mailing Address:</p> <p>P.O. Box, Bldg., Room No., if any</p> <p>Street 275 North Street</p> <p>City Teterboro</p> <p>State New Jersey ZIP Code + 4 07608</p>
5.b. Termination Date 7/15/2011	5.c. Amount 49,868

<p>5.a. Name and Address of Employer (including trade name, if any).</p> <p>Employer United Natural Foods, Inc.</p> <p>Trade Name</p> <p>Attention To: Joseph J Traficanti</p> <p>Title</p>	<p>Mailing Address:</p> <p>P.O. Box, Bldg., Room No., if any</p> <p>Street 313 Iron Horse Way</p> <p>City Providence</p> <p>State Rhode Island ZIP Code + 4 02908</p>
5.b. Termination Date 7/16/2011	5.c. Amount 90,899

<p>5.a. Name and Address of Employer (including trade name, if any).</p> <p>Employer PMG/E&C Enterprises, Inc.</p> <p>Trade Name Quest Transportation</p> <p>Attention To: Andre LeBlanc</p> <p>Title</p>	<p>Mailing Address:</p> <p>P.O. Box, Bldg., Room No., if any</p> <p>Street 12680 Darby Brooke Court</p> <p>City Woodbridge</p> <p>State virginia ZIP Code + 4 22192</p>
5.b. Termination Date 7/19/2011	5.c. Amount 47,088

<p>5.a. Name and Address of Employer (including trade name, if any).</p> <p>Employer Prospect Park Health and Rehab</p> <p>Trade Name</p> <p>Attention To: Terry Jackson</p> <p>Title</p>	<p>Mailing Address:</p> <p>P.O. Box, Bldg., Room No., if any</p> <p>Street 815 Chester Pike</p> <p>City Prospect Park</p> <p>State Pennsylvania ZIP Code + 4 19076</p>
5.b. Termination Date 8/4/2011	5.c. Amount 21,505

<p>5.a. Name and Address of Employer (including trade name, if any).</p> <p>Employer Omega Protein</p> <p>Trade Name</p> <p>Attention To: Joe Kadi</p> <p>Title</p>	<p>Mailing Address:</p> <p>P.O. Box, Bldg., Room No., if any</p> <p>Street 2105 City West Boulevard, Ste. 500</p> <p>City Houston</p> <p>State Texas ZIP Code + 4 77042-2823</p>
5.b. Termination Date 8/28/2011	5.c. Amount 28,849

Name of Person Filing: Peter List	File Number C- 00322
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B. Statement of Receipts Report all receipts from employers in connection with labor relations advice or services regardless of the purposes of the advice or services.	
5.a. Name and Address of Employer (including trade name, if any). Employer G & F Management, Inc. Trade Name Valley Forge Colonial Limited Attention To: Kenneth J Berger Title	Mailing Address: P.O. Box, Bldg., Room No., if any Street 1160 First Avenue City King of Prussia State Pennsylvania ZIP Code + 4 19406
5.b. Termination Date 9/1/2011	5.c. Amount 29,888

5.a. Name and Address of Employer (including trade name, if any). Employer Bethel Industries Trade Name Attention To: Chris Kim Title	Mailing Address: P.O. Box, Bldg., Room No., if any Street 3423 John F. Kennedy Boulevard City Jersey City State New Jersey ZIP Code + 4 07307
5.b. Termination Date 9/12/2011	5.c. Amount 4,442

5.a. Name and Address of Employer (including trade name, if any). Employer Freedom Group, Inc. Trade Name Remington Firearms (Paducah, KY) Attention To: Melissa Cofield Title	Mailing Address: P.O. Box, Bldg., Room No., if any Street 870 Remington Drive City Madison State North Carolina ZIP Code + 4 27025
5.b. Termination Date 9/13/2011	5.c. Amount 41,201

5.a. Name and Address of Employer (including trade name, if any). Employer Price Rite (Woodlawn, MD) Trade Name Attention To: Kathy Freedman Title	Mailing Address: P.O. Box, Bldg., Room No., if any Street 160 Silas Deane Highway City Wethersfield State Connecticut ZIP Code + 4 06109
5.b. Termination Date 9/26/2011 (See Attmmt B)	5.c. Amount 114,265

5.a. Name and Address of Employer (including trade name, if any). Employer Trinitas Hospital Trade Name Attention To: Glenn Nacion Title	Mailing Address: P.O. Box, Bldg., Room No., if any Street 18 South Broad Street City Elizabeth State New Jersey ZIP Code + 4 07207
5.b. Termination Date 9/29/2011	5.c. Amount 1,470

5.a. Name and Address of Employer (including trade name, if any). Employer Freedom Group, Inc. Trade Name Remington Firearms (Lonoke, AR) Attention To: Melissa Cofield Title	Mailing Address: P.O. Box, Bldg., Room No., if any Street 870 Remington Drive City Madison State North Carolina ZIP Code + 4 27025
5.b. Termination Date 10/5/2011	5.c. Amount 18,030

Name of Person Filing: Peter List	File Number C- 00322
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B. Statement of Receipts Report all receipts from employers in connection with labor relations advice or services regardless of the purposes of the advice or services.	
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5.a. Name and Address of Employer (including trade name, if any). Employer Bo Bo Poultry Market Trade Name Attention To: Richard Lee Title	Mailing Address: P.O. Box, Bldg., Room No., if any Street 1131 Grand Street City Brooklyn State New York ZIP Code + 4 11211
5.b. Termination Date 10/6/2011	5.c. Amount 5,925

5.a. Name and Address of Employer (including trade name, if any). Employer Spring Brook Country Club Trade Name Attention To: David Bachman Title	Mailing Address: P.O. Box, Bldg., Room No., if any Street 9 Spring Brook Road City Morristown State New Jersey ZIP Code + 4 07960
5.b. Termination Date 10/10/2011	5.c. Amount 18,281

5.a. Name and Address of Employer (including trade name, if any). Employer Evraz North America (Oregon) Trade Name Attention To: Jennifer Murray Title	Mailing Address: P.O. Box, Bldg., Room No., if any Street 200 East Randolph, Ste. 7800 City Chicago State Illinois ZIP Code + 4 60601
5.b. Termination Date 10/10/2011	5.c. Amount 41,689

5.a. Name and Address of Employer (including trade name, if any). Employer RJ Reynolds Tobacco Company Trade Name Attention To: Scott Lefelar Title	Mailing Address: P.O. Box, Bldg., Room No., if any Street 401 N. Main Street City Winston-Salem State North Carolina ZIP Code + 4 27101
5.b. Termination Date 10/20/2011	5.c. Amount 52,818

5.a. Name and Address of Employer (including trade name, if any). Employer GKN Aerospace Monitor, Inc. Trade Name Attention To: Bob Francis Title	Mailing Address: P.O. Box, Bldg., Room No., if any Street 1000 New Horizons Boulevard City Amityville State New York ZIP Code + 4 11701
5.b. Termination Date 10/20/2011	5.c. Amount 33,161

5.a. Name and Address of Employer (including trade name, if any). Employer Price Rite (Torrington, CT) Trade Name Attention To: Kathy Freedman Title	Mailing Address: P.O. Box, Bldg., Room No., if any Street 160 Silas Deane Highway City Weathersfield State Connecticut ZIP Code + 4 06109
5.b. Termination Date 10/25/2011 (See Attmnt B)	5.c. Amount 4,753

Name of Person Filing: Peter List		File Number C- 00322	
B. Statement of Receipts Report all receipts from employers in connection with labor relations advice or services regardless of the purposes of the advice or services.			
5.a. Name and Address of Employer (including trade name, if any).		Mailing Address:	
Employer Ridgewood Country Club		P.O. Box, Bldg., Room No., if any	
Trade Name		Street 96 West Midland Avenue	
Attention To: Todd Raisch		City Paramus	
Title		State New Jersey ZIP Code + 4 07652	
5.b. Termination Date 11/4/2011		5.c. Amount 1,860	
5.a. Name and Address of Employer (including trade name, if any).		Mailing Address:	
Employer Party Rental, Ltd. (Laurel, MD;		P.O. Box, Bldg., Room No., if any	
Trade Name Pennsauken & Teterboro, NJ)		Street 275 North Street	
Attention To: Gary Halperin		City Teterboro	
Title		State New Jersey ZIP Code + 4 07608	
5.b. Termination Date 7/15/2011		5.c. Amount 93,982	
5.a. Name and Address of Employer (including trade name, if any).		Mailing Address:	
Employer Genco ATC (Milwaukee, WI)		P.O. Box, Bldg., Room No., if any	
Trade Name		Street 100 Papercraft Park	
Attention To: John Machota		City Pittsburgh	
Title		State Pennsylvania ZIP Code + 4 15238	
5.b. Termination Date 10/28/2011		5.c. Amount 53,179	
5.a. Name and Address of Employer (including trade name, if any).		Mailing Address:	
Employer Accord Health		P.O. Box, Bldg., Room No., if any	
Trade Name (Greenleaf/Briarleaf Facilities)		Street 2500 Boulevard of the Generals	
Attention To: James Mulroy		City Norristown	
Title		State Pennsylvania ZIP Code + 4 19403	
5.b. Termination Date 11/18/2011		5.c. Amount 137,765	
5.a. Name and Address of Employer (including trade name, if any).		Mailing Address:	
Employer Seashore Asphalt Corporation		P.O. Box, Bldg., Room No., if any	
Trade Name		Street 2451 Route 610	
Attention To: Mark Ritchie		City Woodbine	
Title		State New Jersey ZIP Code + 4 08270-2438	
5.b. Termination Date 12/20/2011		5.c. Amount 11,303	
5.a. Name and Address of Employer (including trade name, if any).		Mailing Address:	
Employer Consulate Management Company		P.O. Box, Bldg., Room No., if any	
Trade Name		Street 4419 Pheasant Ridge Road, Ste 200	
Attention To: Debra Mason		City Roanoke	
Title		State Virginia ZIP Code + 4 24014	
5.b. Termination Date 12/20/2011		5.c. Amount 17,455	

Name of Person Filing: Peter List		File Number C- 00322	
B. Statement of Receipts Report all receipts from employers in connection with labor relations advice or services regardless of the purposes of the advice or services.			
5.a. Name and Address of Employer (including trade name, if any).		Mailing Address:	
Employer High Penn Oversight, L.P.		P.O. Box, Bldg., Room No., if any	
Trade Name		Street 900 North Michigan Ave., Ste. 1900	
Attention To: Paul Seeman		City Chicago	
Title		State Illinois ZIP Code + 4 60611	
5.b. Termination Date 12/1/2011		5.c. Amount 50,000	
5.a. Name and Address of Employer (including trade name, if any).		Mailing Address:	
Employer High Penn Oversight, L.P. (Security Guards)		P.O. Box, Bldg., Room No., if any	
Trade Name		Street 900 North Michigan Ave., Ste. 1900	
Attention To: Paul Seeman		City Chicago	
Title		State Illinois ZIP Code + 4 60611	
5.b. Termination Date 12/22/2011		5.c. Amount 0	
5.a. Name and Address of Employer (including trade name, if any).		Mailing Address:	
Employer Genco ATC - Various Locations		P.O. Box, Bldg., Room No., if any	
Trade Name (Employee Relations)		Street 100 Papercraft Park	
Attention To: John Machota		City Pittsburgh	
Title		State Pennsylvania ZIP Code + 4 15238	
5.b. Termination Date On-Going* (See Attmnt A)		5.c. Amount 486,216	
5.a. Name and Address of Employer (including trade name, if any).		Mailing Address:	
Employer Sims Metal Management		P.O. Box, Bldg., Room No., if any	
Trade Name		Street 300 Steel Road South	
Attention To: Toni Mazza		City Morrisville	
Title		State Pennsylvania ZIP Code + 4 19067	
5.b. Termination Date 5/4/2011 (See Attmnt D)*		5.c. Amount 8,942	
5.a. Name and Address of Employer (including trade name, if any).		Mailing Address:	
Employer Premio Foods Company		P.O. Box, Bldg., Room No., if any	
Trade Name		Street 50 Utter Avenue	
Attention To: Marc Cinque		City Hawthorne	
Title		State New Jersey ZIP Code + 4 07506	
5.b. Termination Date 8/5/2011 (See Attmnt C)*		5.c. Amount 2,099	
5.a. Name and Address of Employer (including trade name, if any).		Mailing Address:	
Employer		P.O. Box, Bldg., Room No., if any	
Trade Name		Street	
Attention To:		City	
Title		State ZIP Code + 4	
5.b. Termination Date		5.c. Amount	

Kulture Consulting, LLC

759 Bloomfield Avenue, #301 * West Caldwell, NJ * 07006
(973) 403-9901 (O) * (973) 403-0817 (F)

ATTACHMENT B

March 16, 2012

Ms. Kay F. Bethea
U.S. Department of Labor
Employment Standards Administration
Office of Labor-Management Standards
200 Constitution Avenue, NW, Room: N-5119
Washington, DC 20210

RE: ADDENDUM FOR PRICE RITE

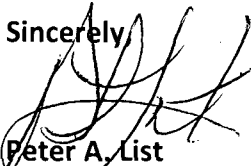
Dear Ms. Bethea:

Kulture Consulting was retained by Price-Rite on a per-hour basis to perform Employee Relations and Human Resources services (non-persuader activity) at their Torrington, Connecticut, location.

During the course of 2011, a separate LM-20 Report was filed for the Woodlawn, Maryland, facility (report filed on 8/1/2011) in which meetings were held with employees to discuss the National Labor Relations Act, the NLRB's election procedures, as well as union organizing tactics.

As payments were received from Price Rite by Kulture Consulting for both its Employee Relations work, as well as the aforementioned facility, this report encompasses all payments received by Kulture Consulting.

Sincerely,



Peter A. List
Founder & CEO

cc: Kathy Freedman – Price Rite

Kulture Consulting, LLC

759 Bloomfield Avenue, #301 * West Caldwell, NJ * 07006
(973) 403-9901 (O) * (973) 403-0817 (F)

ATTACHMENT D

March 16, 2012

Ms. Kay F. Bethea
U.S. Department of Labor
Employment Standards Administration
Office of Labor-Management Standards
200 Constitution Avenue, NW, Room: N-5119
Washington, DC 20210

RE: ADDENDUM FOR SIMS METAL MANAGEMENT

Dear Ms. Bethea:

Kulture Consulting was retained by Sims Metal Management on a per-hour basis to perform Employee Relations Services and training for its employees at its facility. The services provided by Kulture Consulting were of a non-persuader nature.

As payments were received from the above mentioned company by Kulture Consulting for its Employee Relations and training services, this report encompasses all payments received by Kulture Consulting.

Sincerely,



Peter A. List
Founder & CEO

cc: Toni Mazza – Sims Metal Management

Kulture Consulting, LLC

759 Bloomfield Avenue, #301 * West Caldwell, NJ * 07006
(973) 403-9901 (O) * (973) 403-0817 (F)

ATTACHMENT C

March 16, 2012

Ms. Kay F. Bethea
U.S. Department of Labor
Employment Standards Administration
Office of Labor-Management Standards
200 Constitution Avenue, NW, Room: N-5119
Washington, DC 20210

RE: ADDENDUM FOR PREMIO FOODS

Dear Ms. Bethea:

Kulture Consulting was retained by Premio Foods on a per-hour basis to perform Employee Relations Services and training for its supervisors at its facility. The services provided by Kulture Consulting were of a non-persuader nature.

As payments were received from the above mentioned company by Kulture Consulting for its Employee Relations and training services, this report encompasses all payments received by Kulture Consulting.

Sincerely,



Peter A. List
Founder & CEO

cc: Marc Cinque – Premio Foods Corporation

Kulture Consulting, LLC

759 Bloomfield Avenue, #301 * West Caldwell, NJ * 07006
(973) 403-9901 (O) * (973) 403-0817 (F)

ATTACHMENT A

March 16, 2012

Ms. Kay F. Bethea
U.S. Department of Labor
Employment Standards Administration
Office of Labor-Management Standards
200 Constitution Avenue, NW
Room: N-5119
Washington, DC 20210

RE: ADDENDUM FOR GENCO ATC

Dear Ms. Bethea:

Kulture Consulting was retained by GENCO ATC on a per-hour basis to perform employee relations services, to include regular site visits, management and supervisory training with regard to best practices.

During the course of 2011, a separate LM-20 Report was filed for the Milwaukee, WI, facility (report filed on 8/30/2011) in which meetings were held with teammates to discuss the National Labor Relations Act, the NLRB's election procedures, and union organizing tactics.

As payments were received from GENCO ATC by Kulture Consulting for both its Employee Relations work, as well as the aforementioned facility, this report encompasses all payments received by Kulture Consulting.

Sincerely,



Peter A. List
Founder & CEO

cc: Mr. John Machota – Genco