

RAYMOND JAMES®

September 20, 2013

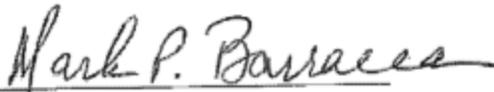
**Re: Disclosures by Compensated Solicitors Under Rule 506(d) of Regulation D
under the Securities Act of 1933, as amended**

Dear Issuer:

Raymond James & Associates, Inc. and Raymond James Financial Services, Inc. (collectively "Solicitors"), confirm that other than as described on Schedule A attached to this letter, they are unaware of any matters that would subject them or any of the persons associated with Solicitors to any of the disqualifying events specified in Section 506(d) of Regulation D, as adopted effective September 23, 2013, under the Securities Act of 1933, as amended, (the "Bad Actor Provisions").

Solicitors agree to inform you promptly should any additional disqualifying events specified in the Bad Actor Provisions apply to Solicitors or any directors, executive officers or any other officers participating in the offerings of the Issuer as specified in the Bad Actor Provisions.

**RAYMOND JAMES & ASSOCIATES, INC.
RAYMOND JAMES FINANCIAL SERVICES, INC.**

By: 
Mark P. Barracca
Vice President
Managing Attorney

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