

McGladrey & Pullen

Certified Public Accountants

To the Shareholders
Comer, Nowling and Associates, P.C.

December 5, 2007

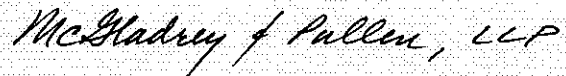
We have reviewed the system of quality control for the accounting and auditing practice of Comer, Nowling and Associates, P.C. (the Firm) in effect for the year ended May 31, 2007. A system of quality control encompasses the Firm's organizational structure, the policies adopted and procedures established to provide it with reasonable assurance of conforming with professional standards. The elements of quality control are described in the Statements on Quality Control Standards issued by the American Institute of CPAs (AICPA). The Firm is responsible for designing a system of quality control and complying with it to provide the Firm reasonable assurance of conforming with professional standards in all material respects. Our responsibility is to express an opinion on the design of the system of quality control and the Firm's compliance with its system of quality control based on our review.

Our review was conducted in accordance with standards established by the Peer Review Board of the AICPA. During our review, we read required representations from the Firm, interviewed Firm personnel and obtained an understanding of the nature of the Firm's accounting and auditing practice, and the design of the Firm's system of quality control sufficient to assess the risks implicit in its practice. Based on our assessments, we selected engagements and administrative files to test for conformity with professional standards and compliance with the Firm's system of quality control. The engagements selected represented a reasonable cross-section of the Firm's accounting and auditing practice with emphasis on higher-risk engagements. The engagements selected included among others, engagements performed under Government Auditing Standards. Prior to concluding the review, we reassessed the adequacy of the scope of the peer review procedures and met with Firm management to discuss the results of our review. We believe that the procedures we performed provide a reasonable basis for our opinion.

In performing our review, we obtained an understanding of the system of quality control for the Firm's accounting and auditing practice. In addition, we tested compliance with the Firm's quality control policies and procedures to the extent we considered appropriate. These tests covered the application of the Firm's policies and procedures on selected engagements. Our review was based on selected tests; therefore, it would not necessarily detect all weaknesses in the system of quality control or all instances of noncompliance with it. There are inherent limitations in the effectiveness of any system of quality control and therefore noncompliance with the system of quality control may occur and not be detected. Projection of any evaluation of a system of quality control to future periods is subject to the risk that the system of quality control may become inadequate because of changes in conditions, or because the degree of compliance with the policies or procedures may deteriorate.

In our opinion, the system of quality control for the accounting and auditing practice of Comer, Nowling and Associates, P.C. in effect for the year ended May 31, 2007, has been designed to meet the requirements of the quality control standards for an accounting and auditing practice established by the AICPA and was complied with during the year then ended to provide the Firm with reasonable assurance of conforming with professional standards.

As is customary in a system review, we have issued a letter under this date that sets forth comments that were not considered to be of sufficient significance to affect the opinion expressed in this report.



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December 5, 2007

We have reviewed the system of quality control for the accounting and auditing practice of Comer, Nowling and Associates, P.C. (the Firm) in effect for the year ended May 31, 2007, and have issued our report thereon dated December 5, 2007. That report should be read in conjunction with the comments in this letter, which were considered in determining our opinion. The matters described below were not considered to be of sufficient significance to affect the opinion expressed in that report.

Comment---The Firm's quality control policies and procedures require consultation in situations that involve newly issued technical pronouncements. During our review, we noted a few instances where consultation was warranted, but the Firm did not adequately consult and utilize its current practice aids when internal control deficiencies were identified during the performance of audit procedures. As a result, auditor communications did not include all required wording to conform with professional standards.

Recommendation---We recommend the Firm reemphasize its quality control policies and procedures and use of current practice aids in all situations where consultation regarding newly issued technical pronouncements is required by Firm policy or otherwise warranted. In addition, the Firm should discuss at a training session its policies regarding consultation and use of current practice aids as outlined in its quality control document.

Comment---The Firm's quality control policies and procedures require documentation of sampling considerations for both tests of controls and substantive testing. During our review, we noted a few instances where documentation of these considerations was missing and/or incomplete. However, through discussions with Firm personnel and review of engagement files, we were able to satisfy ourselves that adequate procedures had been performed.

Recommendation---We recommend the Firm reemphasize its quality control policies and procedures that require documentation of sampling considerations and that the engagement shareholder affirms specifically that these considerations are documented in all situations where it is required by Firm policy or otherwise warranted. In addition, the Firm should discuss at a training session its policies regarding documentation of sampling considerations as outlined in its quality control document.

McGladrey & Pullen, LLP