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Direct phone: 404.873.8504  
Direct fax: 404.873.8505  
E-mail: aaron.danzig@agg.com  
www.agg.com

June 2, 2010

**VIA COURIER**

Mr. John Nemeth  
United States Securities and Exchange Commission  
Atlanta Regional Office  
3475 Lenox Road, NE., Suite 500  
Atlanta, GA 30326-1232

Re: Matria Securities (A-3132)  
SEC request for additional polygraph

Dear Mr. Nemeth:

At our May 5, 2010 meeting, we presented you with the report of polygraph expert, Paul Minor. Mr. Minor was the Polygraph Program Coordinator and Chief Polygraph Examiner for the Federal Bureau of Investigation, and he has supervised polygraph examinations for the Department of Defense. Mr. Minor has conducted polygraph examinations in both the civil and criminal arenas, and he has been hired by defendants and the federal government. As we mentioned, Mr. Minor recently was retained by the enforcement staff in the Securities and Exchange Commission ("SEC") Chicago office regarding a polygraph examination in an insider trading case; thus the Staff should be satisfied with Mr. Minor's credentials and abilities.

Mr. Minor's expert opinion is that Mr. Petit was not deceptive when he denied providing any tips regarding Matria to Mr. Arrowood during the relevant time period. After we provided you with Mr. Minor's report, you asked whether we would allow the Commission staff to speak with Mr. Minor. We would be happy to arrange a time for you or your colleagues to speak with Mr. Minor. Please let me know when you like for us to make him available.

You also asked whether Mr. Petit would be willing to undertake another polygraph examination with an expert chosen by the SEC. In the matter in Chicago, the subject of the SEC's investigation submitted a polygraph report by an expert that he chose and listed that expert on his witness list for trial. When the SEC discounted that report and elected to hire its own polygraph expert as a rebuttal expert to opine that the techniques used by the

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defendant's expert were inappropriate and that the questions asked by the defendant's expert were flawed, the SEC chose Mr. Minor. We selected Mr. Minor in the hopes of avoiding a similar exchange and the need for a second examination. Since Mr. Minor has previously been designated as an expert by the SEC, we believe his report should be sufficient and given great weight in your decision whether to decline any enforcement action against Mr. Petit. Moreover, given the Staff's skepticism of polygraph examinations as expressed at our May 5, 2010 meeting, we are naturally hesitant to offer Mr. Petit up for a second examination to the extent the Staff has foreshadowed that it would also discredit a second examiner's finding of no deception by Mr. Petit.

Nonetheless, Mr. Petit is willing and ready to submit to a second polygraph examination provided that the SEC agrees, in writing, that, should Mr. Petit once again pass the polygraph examination, that the SEC will issue an investigation termination letter and close this matter without any enforcement action.

Mr. Petit has provided full cooperation, answering all of the staff's questions, and providing additional information as requested. He has not raised any privilege objection to the staff's questioning. He affirmatively took and passed a polygraph examination. Even in the light most favorable to the SEC, we strongly feel that the case is severely flawed. We again urge you not to proceed with any enforcement proceeding against Mr. Petit. It would be a mistake and would only serve to unfairly malign the well-earned and long-established reputation of a successful local businessman and noted philanthropist.

Sincerely,

ARNALL GOLDEN GREGORY LLP

  
Aaron M. Danzig

AMD:dw

cc: Parker H. Petit  
Peter H. Bresnan, Esq.  
Kevin B. Getzendanner, Esq.  
Jennifer L. Shelfer, Esq.