

# EXHIBIT 31

**From:** Audrae Erickson </O=CORN/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=AERICKSON>  
**Sent:** Tuesday, August 10, 2010 10:08 AM  
**To:** David Knowles <dknowles@corn.org>  
**Subject:** FW:

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Please bring me a copy of the memo.

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**From:** Richard Berman [mailto:berman@bermanco.com]  
**Sent:** Tuesday, August 10, 2010 11:08 AM  
**To:** David Knowles; Audrae Erickson  
**Subject:** FW:

Following up on my memo yesterday, I wanted to stress that this issue could rapidly transform from an "obesity" issue to a "cancer" issue that could seriously erode sales/margins. We cannot afford for that message to get any traction. Because we can't disprove the research we must show that this is another "everything causes cancer" food scare coupled to the education that fructose is naturally occurring and is in everything (including processed sugar). The shift I am reaching for may seem to be a nuanced difference from our current messaging but it is a distinction with a significant difference. If the UCLA Study triggers anything close to an urban myth about HFCS, the manufactures will take a more serious look at switching. And they won't need Mom's demanding it. We need to have a strategy to get more aggressive with the manufactures keeping them intellectually honest. My reaching out on the issue has to be supplemented where they see us educating the public with a more aggressive tone.

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**From:** Richard Berman  
**Sent:** Monday, August 09, 2010 1:53 PM  
**To:** 'David Knowles'  
**Cc:** David Martosko; Justin Wilson; James Bowers  
**Subject:**

David, recapping my conversation this morning some thoughts in no particular order:

1. The UCLA study may well be the most damaging of all the "studies" on fructose because it is about cancer and plays off an already high foundation of concern.
2. While the message of "they are both the same" works we need more of a shift in tone and intensity which becomes evident as the environment has evolved.
3. The ad I sent you last week is an indicator of what I believe is necessary but this cannot be a one ad for one day campaign.
4. Money allocated for an aggressive campaign should be in the 1 million ballpark for a 6 month period.
5. While this is expensive and may be available from redeployed dollars or newly appropriated money it will look modest in light of several more manufactures switching—a cost that is incurred anew each successive year that the image of HFCS is allowed to be distorted.

In light of this new study I believe we are approaching a tipping point in terms of product switching by manufactures. You can assume that the UCLA study has prompted discussions that will only be evident after the decision to switch has been made. Accordingly, we need to have a full court press to freeze the activity of marketing / R&D product development people with a more forceful fact based message.

I am strongly recommending the CRA call an audible given this latest study. I would not treat it as just one more unfortunate development. It has the potential to unleash much more havoc on the sales side which can in turn feed on itself for momentum.

If you and Audrae want to discuss I am available anytime. Rick