

EXPLANATION OF CERTIFICATION

We have answered in the affirmative the question related to our public file documents, as those documents are now in existence. We hereby explain our answer.

We have uploaded all our issues/programs lists from the fourth quarter of 2012 through the 2nd quarter of 2020. Original issues/programs lists from the fourth quarter of 2012 (the first quarter of the current license term) through the second quarter of 2020 were missing. We have reconstructed lists for these quarters and have uploaded them in the course of preparing this application. It is to be pointed out that the founder of Spirit Educational Association, Inc., Judge Louis James Perona, passed away on November 17, 2016.

We regret this and hereby commit to timely uploading of public file documents in our on-line public file going forward.