

June 11, 2009

Dear Vanguard Trustees,

We, the undersigned, urge Vanguard to drop its opposition to Question 3 on the proxy ballot of certain of its funds and adopt the genocide-free investment procedures proposed by concerned shareholders and coordinated by Investors Against Genocide.

Millions of Vanguard customers are currently voting on this important social issue and will continue to do so until July 2, 2009. Vanguard customers now have an opportunity to request that the Vanguard board "institute procedures to prevent holding investments in companies that, in the judgment of the board, substantially contribute to genocide or crimes against humanity, the most egregious violations of human rights."

Vanguard is opposing Question 3 and claims that the shareholder proposal "duplicates" Vanguard's existing procedures. However, shareholders have no way to judge this claim for themselves since Vanguard has not provided a clear statement of its procedures and has not released the names of companies about which it has concerns or what actions it intends to take to prevent holding investments that it deems problematic. With the genocide in Darfur now entering its seventh year, Vanguard's current approach to companies that substantially contribute to genocide is inadequate.

For Vanguard's customers to have confidence that their funds are not and will not be invested in companies that substantially contribute to genocide, Vanguard should either adopt the proposed shareholder proposal or, alternatively, take the following steps:

- Provide shareholders with a clear, public policy detailing how Vanguard intends to avoid holding companies that substantially contribute to genocide or crimes against humanity;
- Name the companies about which Vanguard currently has concerns; and
- Specify the action to be taken against problem companies.

Vanguard's opaque position stands in stark contrast to the recent, clear, public statements by TIAA-CREF to draw the line at investing in genocide and to take strong action against problem companies.

SEC filings show that, as of December 31, 2008 and January 31, 2009, certain Vanguard funds continued to own hundreds of millions of dollars of stock in companies that are widely cited as the worst problem companies supporting the regime in Sudan: Petrochina, CNPC, Sinopec, ONGC and Petronas. Revenue from these oil companies allows the government of Sudan, headed by a wanted war criminal, to arm and pay its proxy militia, thereby continuing its campaign of mass death and destruction in Darfur.

Public recognition of genocide-free investing has grown over the last few years. The House and Senate unanimously passed the Sudan Accountability and Divestment Act in December 2007, which supports the right of states and other fiduciaries to divest from companies supporting the government of Sudan. At least 27 states and 61 colleges and universities have decided to divest from Sudan, including the University of Pennsylvania whose President, Amy Gutmann, is a Vanguard Trustee.

We urge Vanguard to listen to the millions of private investors who have already voted for genocide-free investing. It is time for Vanguard to embrace and fully implement a procedure to prevent holding

investments in companies that substantially contribute to genocide or crimes against humanity.

Sincerely,

**Americans Against the Darfur Genocide**

Nikki Serapio, Director

**Armenian National Committee of America**

Aram Hamparian, Executive Director

**American Jewish World Service**

Ruth Messinger, Executive Director

**Corporate Governance**

James McRitchie, Publisher

**Darfur Alert Coalition**

Ali Dinar, President

**Darfur Coalition of Georgia**

Melanie Nelkin, Chair

**Enough Project**

John Norris, Executive Director

**Genocide No More-Save Darfur**

Marv Steinberg, Founder and Coordinator

**Investors Against Genocide**

Eric Cohen, Chairman

**Jewish Council of Public Affairs**

Rabbi Steve Gutow, President and CEO

**Jewish World Watch**

Tzivia Schwartz-Getz, Executive Director

**Kentuckiana Interfaith Taskforce on Darfur**

Bob Brousseau, Chair

**Massachusetts Coalition to Save Darfur**

Susan Morgan, Director of Communications

**Massachusetts Council of Churches**

Rev. Jack Johnson, Executive Director

**Midwest Coalition for Responsible Investments**

Barbara Jennings, Coordinator

**New York City Coalition for Darfur**

Sharon Silber, Co-founder

**Physicians for Human Rights**

Susannah Sirkin, Deputy Director

**San Francisco Bay Area Darfur Coalition**

Martina W. Knee, Member, Executive Committee

**Save Darfur Coalition**

Mark Lotwis, Senior Director of Campaign Advocacy

**Stand Canada**

Anne Wagner, Principal Director

**Stanford STAND**

Angie McPhaul, Advocacy Coordinator

**Stop Genocide Now**

Gabriel Stauring, Founder & Director

**Unitarian Universalist Association**

Timothy Brennan, Treasurer & CFO

**Unitarian Universalist Service Committee**

Charlie Clements, President and CEO

**Westchester Darfur Coalition**

Roberta Roos, Coordinator