



DIVISION OF  
CORPORATION FINANCE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549

April 3, 2013

Via E-mail

Angela D. Shinabargar  
Chief Financial Officer  
Butler National Corporation  
19920 West 161<sup>st</sup> Street  
Olathe, Kansas 66062

**Re: Butler National Corporation**  
**Form 10-K for the Fiscal Year Ended April 30, 2011**  
**Filed July 28, 2011**  
**Form 10-K for the Fiscal Year Ended April 30, 2012**  
**Filed July 30, 2012**  
**File No. 000-01678**

Dear Ms. Shinabargar:

We have completed our review of your filings. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filings and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filings to be certain that the filings include the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ David R. Humphrey

David R. Humphrey  
Accounting Branch Chief