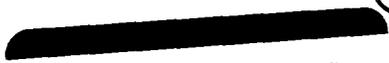




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(High Yield)
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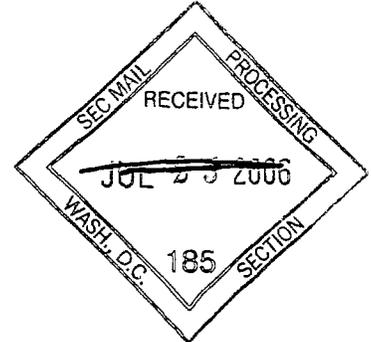
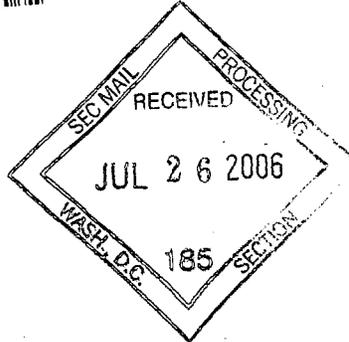
PO Box 4333
Houston, TX 77210-4333
11 Greenway Plaza, Suite 100
Houston, TX 77046-1173
713 626 1919

A I M Advisors, Inc.



06041895

July 21, 2006



VIA CERTIFIED MAIL/RRR

Securities and Exchange Commission
450 Fifth Street
Washington, D.C. 20549

Re: Filing Pursuant to Section 33 of the Investment Company Act of 1940 by A I M Management Group Inc., A I M Investment Services, Inc., A I M Advisors, Inc. (1940 Act Registration No. 801-12313), INVESCO Funds Group, Inc., and the following persons:

- Robert H. Graham
- Mark H. Williamson
- Frank S. Bayley
- Bruce L. Crockett
- Albert R. Dowden
- Edward K. Dunn, Jr.
- Jack M. Fields
- Carl Frischling
- Prema Mathai-Davis
- Lewis F. Pennock
- Ruth H. Quigley
- Louis S. Sklar

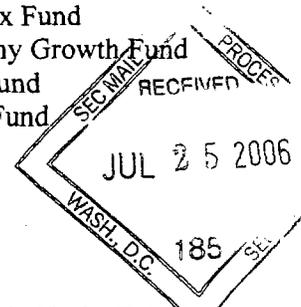
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PROCESSED
AUG 09 2006
THOMSON
FINANCIAL

- AIM Global Growth Fund
- AIM Global Healthcare Fund
- AIM Global Value Fund
- AIM High Income Municipal Fund
- AIM High Yield Fund
- AIM Income Fund
- AIM Intermediate Government Fund
- AIM International Emerging Growth Fund
- AIM International Growth Fund
- AIM Large Cap Basic Value Fund
- AIM Large Cap Growth Fund
- AIM Libra Fund
- AIM Limited Maturity Treasury Fund
- AIM Mid Cap Basic Value Fund
- AIM Mid Cap Core Equity Fund
- AIM Mid Cap Growth Fund
- AIM Municipal Bond Fund
- AIM Opportunities I Fund
- AIM Opportunities II Fund
- AIM Opportunities III Fund
- AIM Premier Equity Fund
- AIM Real Estate Fund
- AIM Select Equity Fund
- AIM Short Term Bond Fund
- AIM Small Cap Equity Fund
- AIM Small Cap Growth Fund
- AIM Tax-Free Intermediate Fund
- AIM Total Return Bond Fund
- AIM Trimark Endeavor Fund

- AIM Aggressive Growth Fund
- AIM Asia Pacific Growth Fund
- AIM Balanced Fund
- AIM Basic Value Fund
- AIM Blue Chip Fund
- AIM Capital Development Fund
- AIM Charter Fund
- AIM Constellation Fund
- AIM Dent Demographic Trends Fund
- AIM Developing Markets Fund
- AIM Diversified Dividend Fund
- AIM Emerging Growth Fund
- AIM European Growth Fund
- AIM European Small Company Fund
- AIM Floating Rate Fund
- AIM Aggressive Growth Fund
- AIM Global Equity Fund

AIM Trimark Fund
AIM Trimark Small Companies Fund
AIM Weingarten Fund
INVESCO Advantage Health
Sciences Fund
INVESCO Core Equity Fund
INVESCO Dynamics Fund
INVESCO Energy Fund
INVESCO Financial Services Fund
INVESCO Gold & Precious Metals Fund

INVESCO Health Sciences Fund
INVESCO International Core Equity Fund
INVESCO Leisure Fund
INVESCO Mid-Cap Growth Fund
INVESCO Multi-Sector Fund
INVESCO S&P 500 Index Fund
INVESCO Small Company Growth Fund
INVESCO Technology Fund
INVESCO Total Return Fund
INVESCO Utilities Fund



Ladies and Gentlemen:

Pursuant to Section 33 of the Investment Company Act of 1940, we hereby file on behalf of AIM Management Group Inc., AIM Investment Services, Inc., AIM Advisors, Inc. (1940 Act Registration No. 801-12313), INVESCO Funds Group, Inc., and the following persons, a copy of **Letter to Judge from Plaintiffs' Attorney** in *Richard T. Boyce v. AIM Management Group, Inc., et al.*

Robert H. Graham
Mark H. Williamson
Frank S. Bayley
Bruce L. Crockett
Albert R. Dowden
Edward K. Dunn, Jr.
Jack M. Fields
Carl Frischling
Prema Mathai-Davis
Lewis F. Pennock
Ruth H. Quigley
Louis S. Sklar
AIM Aggressive Growth Fund
AIM Asia Pacific Growth Fund
AIM Balanced Fund
AIM Basic Value Fund
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AIM Floating Rate Fund
AIM Aggressive Growth Fund

AIM Global Equity Fund
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AIM Global Healthcare Fund
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AIM Income Fund
AIM Intermediate Government Fund
AIM International Emerging Growth Fund
AIM International Growth Fund
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AIM Large Cap Growth Fund
AIM Libra Fund
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AIM Small Cap Equity Fund
AIM Small Cap Growth Fund
AIM Tax-Free Intermediate Fund

July 21, 2006

Page 3

AIM Total Return Bond Fund
AIM Trimark Endeavor Fund
AIM Trimark Fund
AIM Trimark Small Companies Fund
AIM Weingarten Fund
INVESCO Advantage Health
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INVESCO Core Equity Fund
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INVESCO Multi-Sector Fund
INVESCO S&P 500 Index Fund
INVESCO Small Company Growth Fund
INVESCO Technology Fund
INVESCO Total Return Fund
INVESCO Utilities Fund

Sincerely,

A handwritten signature in cursive script, appearing to read "Stephen Rimes", with a horizontal line extending from the end of the signature.

Stephen R. Rimes
Assistant General Counsel

Enclosures

cc: Mr. Robert B. Pike, SEC – Fort Worth
Mr. James H. Perry, SEC – Fort Worth



MILBERG WEISS

Jerome M. Congress
Direct Dial: 212-946-9373
jcongress@milbergweiss.com

June 23, 2006

VIA FEDERAL EXPRESS

Honorable Keith P. Ellison
United States District Judge
United States District Court
Southern District of Texas
United States Courthouse
515 Rusk Avenue
Houston, Texas 77002

Re: *Boyce v. AIM Management Group, Inc.*, et al., No. 04-2587

Dear Judge Ellison:

You are likely aware that two partners at Milberg Weiss,¹ and the firm itself, were recently charged in an indictment returned by a grand jury in the Central District of California. The indictment alleges that, in certain specified cases, fees awarded to Milberg Weiss were improperly shared with three individuals who had served as plaintiffs.

The firm categorically denies that it engaged in any misconduct whatsoever. It intends to fight the charges vigorously, and expects to be fully vindicated.

Nevertheless, I write to advise this Court formally of the situation and to emphasize that the indictment's allegations, besides being unproven, are entirely unrelated to this proceeding. The indictment specifies the cases in which misconduct allegedly took place; this case is not among them. Moreover, the attorneys litigating this matter have not been accused of any wrongdoing. Likewise, the plaintiffs in this matter do not include any of the three individuals who are alleged in the indictment to have received improper compensation for serving in that role.

¹ The two partners, David Bershada and Steven Schulman, took voluntary leaves of absence from the firm prior to the issuance of the indictment.

Milberg Weiss Bershada & Schulman LLP

One Pennsylvania Plaza · New York, NY 10119 · 212-594-5300 · Fax 212-868-1229 · www.milbergweiss.com

NEW YORK · BOCA RATON · WILMINGTON · SEATTLE · WASHINGTON, D.C. · LOS ANGELES



The Honorable Keith P. Ellison
June 23, 2006
Page 2

Some months ago, the firm took affirmative, voluntary steps to ensure that no portion of any future fee is shared with any plaintiff. These steps include a mandatory review and approval process enforced in all cases by an independent monitor, Bart Schwartz, who is a highly respected former Chief of the Criminal Division of the U.S. Attorney's Office of the Southern District of New York.

Several courts to date have recognized that the unproven charges against the firm should have no bearing on their pending cases. *See, e.g., In re Zyprexa Prods. Liability Litig.*, No. 04-MDL-1596 (E.D.N.Y.) (U.S. District Judge Jack B. Weinstein) (retaining Melvyn I. Weiss as chair of the plaintiffs' committee despite the indictment, and commenting, "I know this is an imposition, but I think it is important to have some continuation of the expertise that has been acquired: in view of your eminence at the bar, I think that you, above all, are in a position to help reconstitute the PSC") (June 1, 2006); *Simon, et al. v. KPMG LLP, et al.*, No. 05-CV-3189 (D.N.J. 2006) (U.S. District Judge Dennis M. Cavanaugh) (June 6, 2006) (granting final class certification and approving settlement with Milberg Weiss as class counsel, in face of challenge to firm based on indictment). Such sentiments are consistent with those of the U.S. Attorney herself, Debra Yang, who, in announcing the indictment on May 18, expressed her view that the firm could continue as counsel in unrelated cases: "There are a number of individuals who are at the firm who have not been complicit and who are very well respected and so I can only hope and imagine that they'll sort of step up to the forefront after today." Transcript of May 18, 2006 Press Conference of Debra Wong Yang, United States Attorney for the Central District of California.

I hope this letter addresses any concerns the Court may have. If not, I am prepared to discuss the matter or answer questions in whatever manner the Court deems appropriate.

Respectfully,



Jerome M. Congress

cc: All Counsel (via electronic mail)

