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November 8, 1994

Ms. Anne K. Bingaman
Assistant Attorney General
Antitrust Division
U.S. Department of Justice
Tenth and Constitution Avenue, N.W.
Room 3107
Washington, DC 20530

Re: Burley Stabilization Corporation
Our File No. 13009

Dear Ms. Bingaman:

We have been requested to correspond with you on behalf of Burley Stabilization Corporation to request a business review letter consistent with 28 C.F.R. §50.6. Burley Stabilization is considering a proposal which will result in sales from its inventory of tobacco to domestic cigarette manufacturers and merchants. It is our understanding that the Department of Justice issued a letter on January 23, 1985 in which it expressed that it did not have enforcement intentions with respect to the development of an agreement to offer inventories which existed at that time to domestic purchasers.

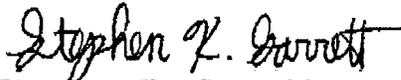
I am advised by Burley Stabilization that a similar need exists today. As stated, it is my understanding that Burley Stabilization Corporation seeks a business review letter at this time as a means of facilitating such a solution. It is also the understanding of Burley Stabilization Corporation that Congress may examine potential legislative changes with reference to the federal tobacco program including direct participation in a process which could involve the sale of current inventories similar to 1985.

We would therefore respectfully request a review of this proposed course of action and a business review letter relating to any enforcement intentions in which the Department of Justice may

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have. Correspondence in response to this inquiry may be directed to either the undersigned or to Mr. William O.L. Myers, Managing Director, Burley Stabilization Corporation, 4320 McCalla Avenue, P.O. Box 6447, Knoxville, Tennessee 37914. We would greatly appreciate a response to this request as soon as possible. Thank you very much.

Sincerely,



Stephen K. Garrett

SKG/ard

cc: Mr. William O.L. Myers
Mr. Barry Grossman