

No. 81-02

Date: December 11, 1981

Foreign Corrupt Practices Act

Review Procedure Release

The Department of Justice has received a review request from Iowa Beef Packers, Inc. ("IBP") pursuant to the Review Procedure Releases Procedure.

In an effort to promote sales of IBP products to the government of the Soviet Union, the company intends to furnish samples of its packaged beef products to officials of the Soviet Ministry of Foreign Trade ("MVT"), the Soviet government agency responsible for procurement of such products. The total amount of the samples which the company intends to furnish to these officials is approximately 700 pounds of beef, with an estimated total value of less than \$2,000. Individual sample packages will not exceed \$250 in value. IBP estimates that prospective sales of packaged beef products to the Soviet government will be in minimum amounts of 40,000 pounds each.

The company has represented that the sample products to be presented to MVT officials are intended as items for their inspection, testing and sampling, and to make these officials aware of the quality of the company's products. IBP also represents that the sample products are not intended for the individual use of the MVT officials, but will be provided to them in their capacity as representatives of the government agency responsible for purchasing the company's products. Finally, the Soviet government has been informed that the company intends to furnish sample products to the MVT officials.

Based on all the facts and circumstances as represented by the requestor, the Department does not presently intend to take an enforcement action with respect to the furnishing of sample products as proposed by the requesting party.

The FCPA Review Letter and this Release have no application to any party which did not join in the request, and can be relied upon by the requesting party only to the extent that the disclosure of facts and circumstances in the request is accurate and complete and continues to accurately and completely reflect such facts and circumstances.