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WILBUR E. BREWTON

received
1-2-02

cc: J. Edgemom

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December 28, 2001

Mr. Brian Connett
PRIDE Enterprise
12425 28th Street, North
Suite 103
St. Petersburg, FL 33716

Re: Union Correctional Institution; Our File NO. 125002-99

Dear Brian:

I have reviewed your Memorandum of December 28, 2001 relating to a projected Union Food Project. As I understand the issue, PRIDE will receive the customer supplied raw meat product; grind the raw meat product and package the same raw meat product into various customer supplied and specified packages. Raw meat will be chilled to the customer's specified temperature; and some of the raw meat may be made into patties (1/3 initially) and over time decreasing as the bulk volume increases.

It is my understanding that the customer supplied raw meat products will not undergo any material change (i.e., it will not be cooked or further processed with the adding of any product other than the customer supplied raw meat product). It is my understanding further, that the product will undergo USDA inspection testing as required; and that the raw meat product will be loaded into refrigerated trucks for transport back to the customer.

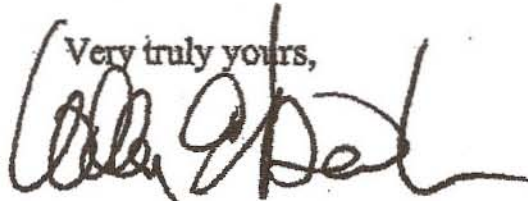
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It is my understanding further that approximately seventy (70) inmates will participate in this correctional work program and will provide a service to a customer located in the State of Georgia. The product will be shipped to destinations as determined by the customer.

Brian, this service, which is proposed to be provided by the inmates of Union Food, is no different from the type service utilized in refurbishing torque converters, such as at South Bay; grapefruit sectioning; or, any other type service, in that inmate labor is being utilized to carry out one aspect of the proposed customer's business (i.e., the grinding of raw meat product and packaging).

Therefore, absent further information and/or subsequent administrative or judicial determination to the contrary, I can see no reason why this project description for Union Food would not be permissible under state and federal law.

Very truly yours,



Wilbur E. Brewton
General Counsel

WEB:ps

cc: Dr. Pamela Jo Davis
Mr. Carl Deimling
Mr. Jack Edgemond

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