



**Swift & Company**

**JBS Swift & Company**  
1770 Promontory Circle  
Greeley, CO 80634-9039

TEL: 970-506-8000

May 14, 2008

Gurrentz Inc.  
davis\_ranch@wildblue.net

Dear Spencer Lund:

JBS Swift & Company is committed to food safety. We have uniform safety processes and procedures across our beef facilities, which are located in Grand Island, Nebraska (Est. 969G); Cactus, Texas (3D); Greeley, Colorado (Est. 969); and Hyrum, Utah (Est. 628). Each of these facilities have completed their HACCP reassessment as required by USDA-FSIS Federal Register Notice of Oct. 7, 2002 and Notice 44-02, 62-07 through 65-07 and are in compliance to 9 CFR 417.

JBS Swift's Food Safety Process consists of Standard Operating Procedures (SOPs), Sanitation Standard Operating Procedures (SSOPs) 9CFR, Part 416, 416.11-416.17, Hazard Analysis Critical Control Points (HACCP) 9CFR, Part 417, 417.1-417.8, and validated technology interventions, which are designed to eliminate or reduce *E. coli* 0157:H7 below detectable levels. Our Food Safety Process is monitored by Operations personnel and verified by Quality Assurance and FSIS/USDA personnel in each plant. Inspection and process verification by FSIS/USDA personnel occurs before the mark of inspection can be placed on products, which will enter into commerce.

We require all animal suppliers to certify that they comply with existing FDA/USDA regulations regarding antibiotic and drug residues and the ruminant-to-ruminant feed ban (FDA 21 CFR Part 589.2000). JBS Swift complies with FSIS Notice 4-04 and 56-07 (10-1-07) which defines the required firewalls associated with Bovine Spongiform Encephalopathy (BSE) by identifying animals 30 months or older and their finished products. (9 CFR Parts 309, 310, 311, 313, 318 and 319 Docket No. 03-0251F).

Our Food Safety Process utilizes technology interventions (Multiple Hurdle Strategy) which include steam vacuums, pre-evisceration wash, thermal pasteurization (CCP), organic acid applications (CCP), finished product organic acid applications, and cold chain management (CCP) systems. The Institute for Environmental Health, located in Seattle, Washington, has independently tested and validated our intervention system.

We perform microbial testing on carcasses and trimmings destined for raw comminuted finished products. Our robust sampling methods are: N=60 per combo bin produced, focused on equal to or greater than 24 sq inches of product surface, combined with a testing method which is AOAC approved, PCR based methodology. We also required our microbial laboratory service providers to submit and pass a Laboratory Proficiency Program on an on-going basis. We perform a monthly 3<sup>rd</sup> party validation testing with an outside lab. We do not release microbial information to anyone other than our customer due to our confidentiality policy.

While we employ exhaustive interventions and testing, there is no available technology which can guarantee that fresh meat products are "free of pathogens." In any situation where there may be a question about the quality of a particular product, it is handled according to FSIS/USDA guidelines and processed into fully cooked products or rendered inedible.

We use only approved third party and customers' audits to confirm that our Food Safety Process is working.

Transporters of JBS Swift & Company beef products are insured and bonded. Loads are sealed at the originating establishments and maintained under seal by the carrier in the event of a multi-stop load.

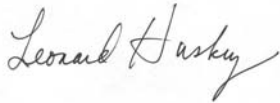
Our Food Safety Process includes a Recall/Market Withdrawal Procedure, which provides for trace-back and track-forward capabilities to ensure that the proper products and dates can be identified if necessary.

Our process also includes a continuing product guarantee, which we provide to our customers upon request. Our Bill of Lading has statements for our HACCP plan to prevent, eliminate, or reduce E.coli 0157H7, and/or that the trim and/or ground beef has been pre-tested and confirmed negative.

The mark of inspection is your sign that the product within was produced under an approved HACCP process. This mark of inspection shall continue to serve as your means of notification that the supplying establishments have fulfilled the regulatory requirements associated with the product's production.

You are cordially invited to visit our facilities and review our processes, with proper notification provided through your Sales Representative or other JBS Swift & Company contact. We trust this information is useful to you and we look forward to serving you as a customer and partner of JBS Swift & Company.

Sincerely,

A handwritten signature in cursive script that reads "Leonard Huskey". The signature is written in black ink on a white background.

Leonard Huskey  
Food Safety & Quality Assurance