

No. 83-03

Date: July 26, 1983

#### Review Procedure Releases

The Department of Justice has received a joint review request from the Department of Agriculture of the State of Missouri and CAPCO, Inc., pursuant to the Review Procedure Releases Procedure.

In an effort to promote the sale of certain Missouri agricultural products and facilities to an instrumentality the Government of Singapore, CAPCO, Inc. intends to offer, through a representative of the Missouri Department of Agriculture, to pay the reasonable and necessary expenses of a Singapore government official in connection with a series of site inspections, demonstrations and meetings to be held in six Missouri counties during approximately a 10-day period in the Fall of 1983.

CAPCO, Inc., a Missouri corporation, is engaged in the management of properties owned by foreign investors. While no agreement presently exists with respect to the retention of this firm in the future management of any investments which may be made by the Government of Singapore, individual officers of the firm are owners and officers of properties and firms which may enter into supply or service contracts or sales agreements with that government.

The necessary and reasonable expenses of the foreign government official which are proposed to be paid by CAPCO, Inc. will include the round-trip airfare for one official between Singapore and the United States and the travel, lodging, meals and entertainment expense for that official while in Missouri.

During the official's proposed visit to Missouri, the Department of Agriculture of the State of Missouri may pay for certain additional local travel, lodging, meals and entertainment expenses of the foreign government official in connection with the demonstration and promotion of Missouri products and facilities. In the event that the foreign government official should inadvertently pay directly for any lodging, meals or local travel, CAPCO, Inc. and the Missouri Department of Agriculture propose to reimburse the official for his expenditure, provided an adequate receipt is furnished.

Based on all the facts and circumstances as represented by the requestors, the Department does not presently intend to take an enforcement action with respect to the hosting of the Singapore government official as proposed by the requesting parties.

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 parties 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.