



Food Security and Defense

Why Food Safety is Critical

William D. Marler, Esq.

It is a Global Food Economy



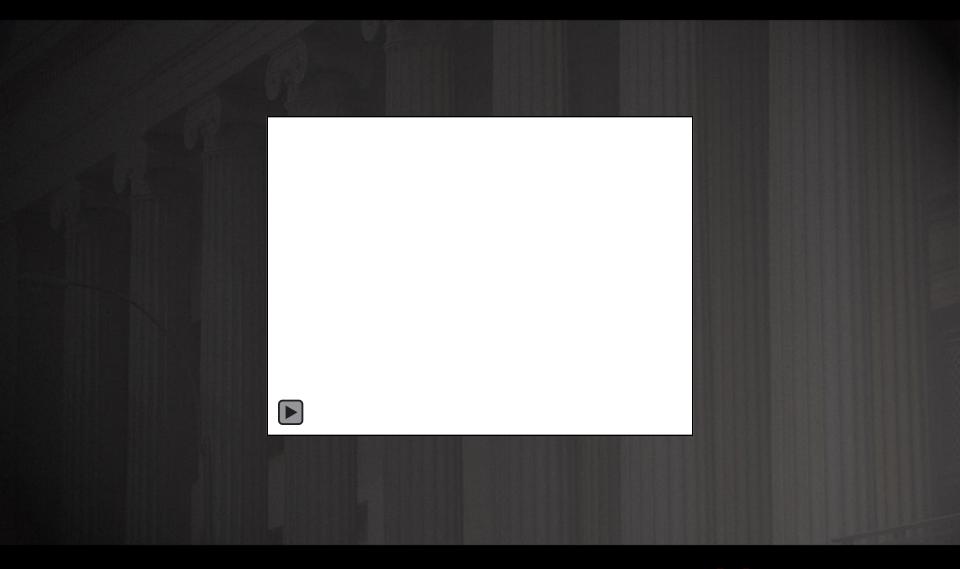


To Put Things in Perspective



- Microbial pathogens in food cause an estimated 48 million cases of human illness annually in the United States
- 125,000 hospitalized
- Cause up to 3,000 deaths

What we all want to Avoid





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	:NightOC.com	IN THE SUGGESTION BOX. IN THE SUGGESTION BOX.
Lace	er vigino C.com	Testaurant Procedure (POS. Admin, Maintenance, etc.) Goality Improvement (Procedure, Equipment, System) OSCHY Standards New Froduct Other Describe champe/New Product idea d think argular patting Ohould cook longer, May demit out done and
		we have Cuctomes complaints
	should	
	the hai	cook longer. They don't get done and





uly 24, 1992

Wendy Cochinella Shift Leader JACK IN THE BOX #8466 3618 172nd. St. W.E. Arlington, WA 98223

Dear Wendyt

We have received your suggestion regarding increasing the cooktime

Your suggestion is currently being researched within the Corporate Office. You will again be notified with more detail as soon as a decision has been and regarding this suggestion.

We would like to acknowledge the time and effort you have taken to contribute to the success of JACK IN THE BOX by enclosing this pen/highlighter. Each person submitting suggestions is eligible to receive one gift per quarter with their first suggestion.

Sincerely,

Randell & Hoppan

We would like to acknowledge the time and effort you have taken to contribute to the success of JACK IN THE BOX by enclosing this pen/highlighter. Each person submitting suggestions is eligible to receive one gift per quarter with their first suggestion.

> ranchin Mike Mconitty Janice Eubank, Restaurant Manager Jases Ed Mulhausen - Borthwest Rex Lynch - Northwest

suggest/jad/suggest4



Service P.G. No. 100 Sam Ca WILLIAM 6/9/373.8161





August 28, 1992

Today of Today

Wesdy Cochinella Shift Leader JACK IN THE BOX 89466 3818 172nd. St. N.E. Arlington, WA 98223

Dear Wendy:

Thank you for your suggestion that we increase the cooktime for our regular perior.

We have researched your segments and determined that with the variability of our guilt semperatures (350° = 450°) the two-minute coolstant is appropriate. If the parties are coolered longer than two minutes, they tend to become tough. To minute that you are monting quality expectations for regular power, places enture that the guilt temperature is connect and guilt expectations for regular power, places enture that the guilt temperature is connect and guilt expectations for temperature and guilt expectations.

builds, Amil and again for your acceptant. We appreciate and that your moons for

We have researched your suggestion and determined that with the variability of our gail temperatures (350° - 400°) the two-minute coolaine is appropriate. If the patties are coolain longer than two minutes, they tend to become tough. To ensure that you are meeting quality expectations for regular parties, please ensure that the gail temperature is connect and gail personnel are using proper procedures.

cet Stephanie Green
Vanessa Franchin
Mike McQuirty
Janice Eubank, Restaurant Manager 18466
Ed Mulhausen - Northwest
Rex Lyoch - Northwest

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How Are Things are Different Today?





Now a 76 Count Federal Indictment

- Stewart Parnell, the former owner of Peanut Corp. of America
- Michael Parnell, who is Stewart Parnell's brother and a former supervisor
- Samuel Lightsey, a onetime plant operator
- Mary Wilkerson, a former qualityassurance manager
- Daniel Kilgore, plant manager

- Allegations Include:
- Mail Fraud
- Wire Fraud
- Introduction of Adulterated and Misbranded Food into Interstate Commerce with Intent to Defraud or Mislead
- Conspiracy





And, It Does Not Always Require Intent

- A misdemeanor conviction under the FDCA, unlike a felony conviction, does not require proof of fraudulent intent, or even of knowing or willful conduct.
- Rather, a person may be convicted if he or she held a position of responsibility or authority in a firm such that the person could have prevented the violation.
- Convictions under the misdemeanor provisions are punishable by not more than one year or fined not more than \$250,000 or both.





Planning AGAINST Litigation – What Is Really Important

- Identify Hazards
 - HACCP
 - Do you have qualified and committed people?
- What is the Culture?
- Involve Vendors and Suppliers
 - Do they really have a plan?
 - Ever visit them?



Planning AGAINST Litigation – Establish Relationships

They are your best friends!





Questions?



