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March 26, 2010

Via E-mail and Express Mail

Cartel Criminalisation
Ministry of Economic Development
P.O. Box 1473
Level 8, 33 Bowen Street
Wellington 6140
New Zealand

Re: Comments Regarding the Discussion Document on Cartel Criminalization

On behalf of the American Bar Association Sections of Antitrust Law and International Law, we are pleased to submit the attached comments to the New Zealand Ministry of Economic Development regarding the Discussion Document on Cartel Criminalization.

Please note that these views are being presented only on behalf of the Sections of Antitrust Law and International Law. They have not been approved by the House of Delegates or the Board of Governors of the American Bar Association and should not be construed as representing the position of the American Bar Association.

If you have any questions after reviewing this report, we would be happy to provide further comments.

Sincerely,



Ilene K. Gotts
Chair, Section of Antitrust Law



Glenn P. Hendrix
Chair, Section of International Law

Attachment