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AMERICAN BAR ASSOCIATION

September 28, 2009

Via E-mail and Express Mail

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Secretaria de Direito Econômico
Departamento de Proteção e Defesa Econômica
Esplanada dos Ministérios
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CEP: 70064-900, Brasilia, DF, Brazil

Reference: Public Consultation No. 16/2009 (Consulta Pública No. 16/2009)

Dear Sirs:

On behalf of the American Bar Association Sections of Antitrust Law, International Law, and Criminal Justice, we are pleased to submit the attached comments (in English and Portuguese) to the Secretariat of Economic Law of Brazil's Ministry of Justice with respect to the draft regulation submitted to public consultation no. 16, dated August 20, 2009.

Please note that these views are being presented only on behalf of the Sections of Antitrust Law, International Law, and Criminal Justice. 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



Charles J. Hynes
Chair, Section of Criminal Justice

Attachments