

ASSOCIATION YEAR  
2009-2010

**CHAIR**

Ilene Knable Gotts  
51 West 52nd Street  
New York, NY 10019-6119

**CHAIR ELECT**

Allan Van Fleet  
100 Louisiana Street  
Houston, TX 77002-5018

**VICE CHAIR**

Richard M. Steuer  
1675 Broadway  
New York, NY 10019-5820

**SECRETARY AND**

**COMMUNICATIONS OFFICER**  
Howard Feller  
Richmond, VA

**COMMITTEE OFFICER**

Brian R. Henry  
Atlanta, GA

**FINANCE OFFICER**

Keith D. Shugartman  
Washington, DC

**INTERNATIONAL OFFICER**

Theodore Voorhees, Jr.  
Washington, DC

**PROGRAM OFFICER**

Bernard A. Nigro, Jr.  
Washington, DC

**PUBLICATIONS OFFICER**

Debra J. Pearlstein  
New York, NY

**SECTION DELEGATES**

Christopher B. Hockett  
Menlo Park, CA

Joseph G. Krauss  
Washington, DC

**IMMEDIATE PAST CHAIR**

James A. Wilson  
Columbus, OH

**COUNCIL MEMBERS**

Alicia L. Downey  
Boston, MA

Michael G. Egge  
Washington, DC

Deborah A. Garza  
Washington, DC

Andrew I. Gavil  
Washington, DC

Kenneth L. Glazer  
Washington, DC

Jonathan M. Jacobson  
New York, NY

Deborah Platt Majoras  
Cincinnati, OH

Mark S. Popofsky  
Washington, DC

J. Robert Robertson  
Washington, DC

Douglas C. Ross  
Seattle, WA

Patrick S. Thompson  
San Francisco, CA

Randolph W. Tritell  
Washington, DC

John E. Villafranco  
Washington, DC

Mark D. Whitener  
Washington, DC

Gary P. Zanfagna  
Morristown, NJ

**NON-U.S. LAWYER**

**REPRESENTATIVE**  
Calvin S. Goldman  
Toronto, ON

**NON-LAWYER**

**REPRESENTATIVE**  
David T. Scheffman  
Washington, DC

**DOJ REPRESENTATIVE**

Christine A. Vamey  
Washington, DC

**FTC REPRESENTATIVE**

Jonathan D. Leibowitz  
Washington, DC

**JUDICIAL REPRESENTATIVE**

Douglas H. Ginsburg  
Washington, DC

**STATE ATTORNEYS**

**GENERAL REPRESENTATIVE**  
James A. Donahue III  
Harrisburg, PA

**BOARD OF GOVERNORS**

**REPRESENTATIVE**  
Paulette Brown  
Madison, NJ

**YOUNG LAWYERS**

**DIVISION REPRESENTATIVE**  
Svetlana S. Gans  
Washington, DC

**SECTION DIRECTOR**

Joanne Travis  
Chicago, IL

Travisj@staff.abanet.org

AMERICAN BAR ASSOCIATION

September 28, 2009

**Via E-mail and Express Mail**

Ministry of Justice  
Secretaria de Direito Econômico  
Departamento de Proteção e Defesa Econômica  
Esplanada dos Ministérios  
Bloco T - 5o andar - Sala 552  
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