

AMERICAN BAR ASSOCIATION

Section of Antitrust Law
321 North Clark Street
Chicago, IL 60654-7598
(312) 988-5550
FAX: (312) 988-5637
E-mail: antitrust@abanet.org
<http://www.abanet.org/antitrust>

**ASSOCIATION YEAR
2008-2009**

CHAIR

James A. Wilson
52 East Gay Street
Columbus, OH 43216

CHAIR ELECT

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

VICE CHAIR

Allan Van Fleet
Suite 1800 Wells Fargo Plaza
1000 Louisiana Street
Houston, TX

**SECRETARY AND
COMMUNICATIONS OFFICER**
Richard G. Parker
Washington, DC

COMMITTEE OFFICER
Richard M. Steuer
New York, NY

FINANCE OFFICER
Keith D. Shugman
Washington, DC

INTERNATIONAL OFFICER
H. Stephen Harris, Jr.
Atlanta, GA

PROGRAM OFFICER
Christopher B. Hockett
Menlo Park, CA

PUBLICATIONS OFFICER
Debra J. Pearlstein
New York, NY

SECTION DELEGATES
Joseph G. Krauss
Washington, DC

Theodore Voorhees, Jr.
Washington, DC

IMMEDIATE PAST CHAIR
Kathryn M. Fenton
Washington, DC

COUNCIL MEMBERS
Stephen Calkins
Detroit, MI

Patricia A. Conners
Tallahassee, FL

Alicia L. Downey
Boston, MA

Michael G. Ege
Washington, DC

Howard Feller
Richmond, VA

Deborah A. Garza
Washington, DC

Kenneth L. Glazer
Washington, DC

Brian R. Henry
Atlanta, GA

Jonathan M. Jacobson
New York, NY

Bernard A. Nigro, Jr.
Washington, DC

Mark S. Popofsky
Washington, DC

J. Robert Robertson
Washington, DC

Randolph W. Tritell
Washington, DC

John E. Villafranco
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
Thomas O. Barnett
Washington, DC

FTC REPRESENTATIVE
William E. Kovacic
Washington, DC

JUDICIAL REPRESENTATIVE
Lewis A. Kaplan
New York, NY

**STATE ATTORNEYS
GENERAL REPRESENTATIVE**
Robert L. Hubbard
New York, NY

**BOARD OF GOVERNORS
REPRESENTATIVE**
Paulette Brown
Madison, NJ

**YOUNG LAWYERS
DIVISION REPRESENTATIVE**
Andreas M. Agathokitis
Washington, DC

SECTION DIRECTOR
Joanne Travis
Chicago, IL
(312) 988-5575
(312) 988-5637
Travisj@staff.abanet.org

May 29, 2009

Via E-mail and Express Mail

Mr. Robert J. Morin
Competition Bureau
50 Victoria Street
Gatineau, Québec
K1A 0C9

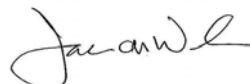
Dear Mr. Morin:

On behalf of the American Bar Association Sections of Antitrust Law, Business Law, Criminal Justice and International Law, we are pleased to submit the attached Comments on the Revised Draft Information Bulletin on Sentencing and Leniency in Cartel Cases Issued by the Competition Bureau of Canada.

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



James A. Wilson
Chair, Section of Antitrust Law



Karl J. Ege
Chair, Section of Business Law



Anthony A. Joseph
Chair, Section of Criminal Justice



Aaron Schildhaus
Chair, Section of International Law

Attachment