

[REDACTED]

---

**From:** Pastoral.Office.Maverick.Ministries [REDACTED]  
**Sent:** Tuesday, November 08, 2016 8:08 PM  
**To:** ATR-FRC-InternationalGuidelines  
**Cc:** [REDACTED]  
**Subject:** Submission re the DoJ Review of the Antitrust International Guidelines

**Submission to the DOJ ATR Antritrust Review of its International Guidelines**

Our prayer groups refer to your invitation to comment before Dec. 1 2016 on your Paper that's attached below for reference purposes.

**About us:**

Our parishioners from Australia, New Zealand and California and Nevada are in the U.S. SEC whistleblower program and include submitters to Mr Jorge Dipeco Chief Counsel at the First Division Appellate Division Disciplinary Committee 61 Broadway New York, inventors of products that were to be shown to US military at "G'Day USA in L.A", members in associations that oppose abuse of the Disabled in care homes, and victims of predatory white collar bank crimes.

Our Patron Saint is St Jude because he looks after impossible cases, and our cases arrested drug traffickind scam 'law firm support services', Mastercard's lawyer Keila Ravelo, and former IT adviser to a certain Presidents' Foundation and CSC.

Our parishioners are also victims of retaliation by Australian bureaucrats and banks that, in Visa's Case, told the SEC in a Form 10 for Sept 2016 that "we (Visa) may even face insolvency" because \$4,000,000,000 might be (to quote the National Retailer Federation's General Counsel Mr Duncan) "pennies in the dollar". (It was a case where Judges found that Visa strategised with opposing lawyers, lawyers unethically colluded about Reserve Bank Australia material, and where "Clause VI" of a DoJ Deferred Prosecution Judgement in 2011 says the DoJ can get files from Mastercard and Visa and get executives to answer questions about, say, collusion between Amex Visa Mastercard, 40 global banks and unethical ex lawyers for the 15,400,000 sleepy merchants who were suckered by their own lawyers into a deal for "pennies in the dollar". We're shocked at how far the unethical lawyer collusion might go around the world and into the CEOs and Directors and Audit Committees! We're also shocked at the deplorable attempts to get at Protected Disclosers).

Our prayer groups are also published at Australian Government Inquiries like the "David Murray FSI Review" in which Protected Disclosers predicted that the unethical collusion over Reserve Bank of Australia evidence would cause Amex's shares to fall after Amex would lose the trial 'US & 17 States v Amex Mastercard & Visa'. Our groups are also published at the Australian "PJC" Inquiry and "Inquiry into Foreign Bribery" on cases that later resulted in USAO's Eileen Decker and the FBI's Diedre Fike's press releases a month ago, Sept 27 2016, as saying that international borders won't stop the FBI from jumping out of the bushes in Sydney Australia on international defrauders of a company company. CSC, that does Defence Department computers.

Our groups were stunned at the Commonwealth Bank of Australia's use of G4S ex military "spies" to spy on Australian politicians and law reform groups who want a Royal Commission into white collar crimes like international bribery and backroom deals.

**Kara Brockmeyers' concerns:**

We refer to comments by the SEC's Ms Kara Brockmeyer's concerns with the way Australian law enforcement operates hap hazardly and passes the parcel like a hot potato hither and thither between Australian law agencies . We share her concerns, as we also share the concerns by Transparency International. Our prayer groups presently urge the Australian Government to hold a "Royal Commission of Inquiry" into white collar international corporate crime. The cases we came across stunned lawyers in New York (or they were in on it and now say they knew nothing). Something needs to be done about Australian bodies who tip off criminals. The incestuous overlap by mobsters, white collar criminal and the 'legal ethics regulators' and "FOS" is so bad that some honest people in the Victorian legal board tipped off our SEC whistleblowers about the Board CEO's intention to spy on politicians and possible witnesses/disclosers to cases the FBI had against international bribery. The Commonwealth Bank bribery case could involve a 65% mark up on a \$1.5 billion computer upgrade for Australia's biggest bank. Can you imagine ripping off bank shareholders by 65% on \$1,500,000,000 and ripping off Computer Science Corp of \$98,000,000?. We think serious thought has to go in to how to stop Aussie white collar circles from ripping off American companies, and how to stop the types of backdoor spying and retaliations on Protected Disclosers.

### **Weaknesses in the guardianship of Protected Discloser's identities and information:**

The SEC whistleblower program depends on anonymity in regimes that are going down the path of attacking anyone who speaks out. There are attacks on lawyers in foreign countries like Australia who stand as 'guardians' between Protected Disclosers and those who abuse legal ethics laws as a way to obtain intel on things that protected disclosers reported to the SEC.

In Melbourne Australia for example the legal ethics board appears to have an unhealthy relationship with its directors from the banking, fracking, gas and oil sectors - can you imagine a Bar Association that's run by Banks Oil & Frackers that are often investigated by the SEC? Our ministry is very concerned that our SEC tipoff reports can fall into the hands of a foreign government's 'ethics board' that seems to work hand in glove with directors of multinational companies and seems to work hand in glove with very dubious characters who were identified in Parliamentary reports for running boiler room operations, threatening to use stand over men, and operating sham litigation services. Our ministry suggests that the anti-trust division looks into how it can possibly protect foreign-based whistleblowers when a legal ethics board can walk in and take over SEC reports with names and information that may be very very important to embryonic task force investigations. In one case, the SEC and USAO Central California has a grand jury investigation into international bribery with IT executives in companies that do computers for the US & Australian Defence Departments AND the I,T whiz is with a certain President's "Global Initiative" Foundation. (What were the Victorian State Government's board of directors from the casino and oil industry trying to find out by spying on what our Protected Disclosers asked the SEC to look into, we ask).

In another case, our parishioners were tipped off by honest legal ethics board staff that they should report concerns to the SEC's whistleblower program, rather than the Australian authorities, in connection with collusion by lawyers and drug trafficking owners of sham litigation support services for MasterCard's lawyers that was uncovered by dawn raids by the IRS criminal division and DEA. Judges Garaufis, Winter, Jacobs and Leval were appaled enough to overturn anti-trust settlement deeds between 15,000,000 US retailers and American Express, MasterCard and VISA as is summarised in an from the Federal Bar Association Magazine under the Headline "Lessons Learned from in re Anti-Trust Steering Rules Litigation". The Australian "Fed Reserve" evidence was funnelled by drug trafficking defrauders of two international law firms, and the evidence was misrepresented to the SEC and courts and the merchants for the purpose of falsely inducing them to sign up to small awards of damages. The identities and information of our parishioners were hunted by so-called ethics regulatory lawyers in a foreign government board in Melbourne Victoria even though the ethics lawyers knew that they were assisting sham litigation support firms that use stand over men and had run a boiler room

operation which was closed by the Australian politician The Honourable Kelvin Thomson with the help of the fraud squad. And this time the arrested people included a ex workpal of another outgoing President's wife and a donor of \$500,000 to a Democrat pac. (Who are this Victorian State Government board really working for???). Your international guidelines should, we think, warn people that Australia's legal ethics are either very very different or they're in on something very odorous.

With this in mind, we are very concerned with an Australian law enforcement practice that allows Australian law enforcement to delegate information and investigations to a strange Law Society that is set up under an Act of Parliament on which sits directors from the casino, oil banking and fracking industries, and is staffed by people who passed information about our SEC Protected Disclosers to criminals. Can we suggest that the SEC looks into if it can intervene in foreign courts to restrain backdoor tactics. In a matter our parishioners had, their colleagues in New South Wales believe that 18USC1513 is an extra territorial and extraditable offence for intimidation of protected disclosers. Possibly it is worthwhile considering ways to effectively put a shot across the bow of those in foreign government boards that help organised and white collar criminals to spy on what the FBI and other international investigators might be looking into.

### **Recurrent funding for independent protectors of protected disclosers?**

Finally, as you will understand, whistleblowers often suffer severe financial hardship and retaliation. We would recommend that, at least in cases where the DOJ, FBI etc etc think there is plenty of smoke, that whistleblowers are assisted financially in some way simply to keep the wolves from the door. One of our protected disclosers turned down a million-dollar hush deed and was foreclosed upon by the bank and the lawyers who threatened to foreclose on US citizens in Australia, and the legal ethics board threatened to prosecute the vendor of a home to the US citizens. The financial fallout for not succumbing to threats and not succumbing to a very juicy dangled a carrot has been disastrous for all concerned. If anything can be done to help keep wolves from the door, it should be. There are billions in fines to be made by the U.S. government in some cases so perhaps some form of recurrent financial assistance could stop possible witnesses being forced to turn to crime or something to get by. There is a certain irony about being a whistleblower on banks, and then having to become a bank robber to put food on the table.

Some cases can be very big with massive repercussions for unethical directors and audit committees. For example according to recent SEC Form 10s for June and September 2016, VISA states "we may even face insolvency" as a result of the collusion between unethical lawyers and convicted drug trafficking defrauders of two international law firms that had operated a sham litigation support service which copies highly sensitive information in litigation, which in the case in question was Australian Reserve Bank (being the Australian equivalent of the Fed Reserve). While VISA's Form 10 laments that \$4,000,000,000 may not be enough compensation, MasterCard's Form 10 budgets on around \$1.1 billion for compensation, and American Express' Form 10 budgets on a few hundred million dollars. In other words, there is organised crime mixed with high-powered lawyers who were caught out because red flags were tugged upon to find out why a foreign government legal ethics board in Melbourne Australia was actively supporting people with known ties to sham litigation support firms and stand over men. This very strange legal ethics board is a type of bar Association run by directors of multinational oil banking and fracking and casino companies, and this strange legal ethics board used a Soviet-era style interrogation called Gas Lighting to obtain as much possible information about the Department of Justice's prosecution of US & 17 States v American Express. The anti-trust division and associated task force members should, we suggest, look at funding overseas witness programs that run by genuine dedicated anticorruption advocates. A fairly small annual stipend could pay for itself simply in fines on unethical accounts, auditors, lawyers, directors and multinational companies.

God bless

**Maverick Ministries**  
**PO Box 444**  
**Clemens California**

Sent from [ProtonMail](#), Swiss-based encrypted email.

Attached: The DOJ's Review Paper:

### **Related Documents:**

- [Proposed Update of Antitrust Guidelines for International Enforcement and Cooperation](#) (November 1, 2016)
- [Antitrust Enforcement Guidelines for International Operations](#) (April 1995)
- Press Release: [Justice Department and Federal Trade Commission Seek Public Comment on Proposed Updates to International Antitrust Guidelines](#) (November 1, 2016)

The Department of Justice's Antitrust Division and the Federal Trade Commission (FTC) seek public comment on proposed Antitrust Guidelines for International Enforcement and Cooperation. The proposed guidelines update the 1995 Antitrust Enforcement Guidelines for International Operations and provide guidance to businesses engaged in international activities on questions that concern the Agencies' international enforcement policy as well as the Agencies' related investigative tools and cooperation with foreign authorities. The proposed guidelines reflect the growing importance of antitrust enforcement in a globalized economy and the Agencies' commitment to cooperating with foreign authorities on both policy and investigative matters.

The proposed revisions restructure the previous guidelines in order to make the guidelines more useful and accessible by focusing on the questions of greatest significance to users. The proposed revisions also describe the current practices and methods of analysis the Agencies employ when determining whether to initiate and how to conduct investigations of, or enforcement actions against, conduct with an international dimension.

In particular, the revisions:

- Add a chapter on international cooperation, which addresses the Agencies' investigative tools, confidentiality safeguards, the legal basis for cooperation, types of information exchanged and waivers of confidentiality, remedies and special considerations in criminal investigations;
- Update the discussion of the application of U.S. antitrust law to conduct involving foreign commerce, the Foreign Trade Antitrust Improvements Act, foreign sovereign immunity, foreign sovereign compulsion, the act of state doctrine and petitioning of sovereigns, in light of developments in both the law and the Agencies' practice; and
- Provide revised illustrative examples focused on the types of issues most commonly encountered.

### **Public Comments**

As part of the International Guidelines update process, the Agencies invite interested parties, including attorneys, economists, academics, consumer groups, and the business community to submit comments. Comments must be received at [ATR.InternationalGuidelines@usdoj.gov](mailto:ATR.InternationalGuidelines@usdoj.gov)

Email links icon  
by **December 1, 2016**.

**Privacy and Confidentiality:** Written submissions and the identity of the submitter may be disclosed, reproduced, and distributed by publication and/or posting on the Department of Justice or FTC websites, at the discretion of the Department of Justice or the FTC. Written submissions cannot be kept confidential by the Department of Justice or the FTC and therefore should not include any information that the submitting person wants to keep confidential.

**Copyrighted Material:** Neither the Department of Justice nor FTC will post copyrighted material included in comments on their websites without permission from the copyright owner(s).

Updated November 8, 2016