

From: Bill Eubanks <eubanks.bill@gmail.com>
Sent: Thursday, December 3, 2009 9:14 AM
To: ATR-Agricultural Workshops <agriculturalworkshops@usdoj.gov>
Subject: Comments Regarding Agriculture and Antitrust Enforcement Issues in Our 21st Century Economy from William S. Eubanks II
Attach: A Rotten System.pdf; The Sustainable Farm Bill.pdf; A Rotten System.docx

Hello,

I am providing these comments pursuant to 74 Fed. Reg. 43725 (Aug. 27, 2009). I am an environmental attorney with the public interest law firm of Meyer Glitzenstein & Crystal. Additionally, I am a legal scholar, frequently publishing academic works in many of the nation's premier law reviews.

One issue to which I have devoted substantial effort is the United States Farm Bill and the inequitable policies created by that legislation. My unabridged paper on that topic was published by Stanford University, and my abridged paper was published by the Environmental Law Institute in its Environmental Law Reporter. Each of those papers is attached to this email (unfortunately, the ELI paper is available only in PDF -- please contact me if that is a problem). I am also sending a copy of each via mail.

These two papers, which currently serve as the most thorough and up-to-date legal, scientific, and policy-based examination of the agriculture industry and its widespread environmental, public health, financial, and other impacts, are important comments that should be considered by the Department of Justice Antitrust Division moving forward on these issues.

Please do not hesitate to contact me if you have further questions. I would be more than willing to discuss these issues with those overseeing the workshops, or to present at the workshops if there is interest in my expertise on these issues.

Sincerely,

William S. Eubanks II, Esq.
Meyer Glitzenstein & Crystal