

**From:** Mills, Charles Roe  
**Sent:** Saturday, October 04, 2008 11:26 PM  
**To:** MMR  
**Subject:** RE: Market Manipulation Rulemaking Workshop -- Request to Participate, P082900

I respectfully request to participate as a panelist at the Federal Trade Commission's November 6, 2008 Workshop concerning its petroleum market manipulation rulemaking, as a representative of the Committee on Futures and Derivatives Regulation of the Association of the Bar of the City of New York ("CFRD"). The CFRD submitted a comment to advance notice of proposed rulemaking and is intending to submit a comment to the pending proposed rulemaking by the October 17, 2008 deadline. I am the Chair of the CFRD's Energy Subcommittee.

I respectfully submit that I have sufficient expertise and knowledge with respect to issues relating to energy market manipulation and securities law precedents under Securities Exchange Act Section 10(b) and Securities and Exchange Commission rule 10b-5 that are of central concern to the Federal Trade Commission's proposed rule 317.3. I am a partner with the law firm of K&L Gates LLP. I have been an active member of the commodity and derivatives law bar since 1977, when I began work as an attorney with the Commodity Futures Trading Commission. I currently am the Chair of the American Bar Association's Committee on Derivatives and Futures Law. Over the past ten years, I have represented many parties in investigations and proceedings of suspected or alleged energy market manipulation commenced by the Commodity Futures Trading Commission, the Federal Energy Regulatory Commission, and the U.S. Department of Justice. I also have extensive experience with federal securities law having had an active private practice in securities enforcement, litigation, and compliance counsel for over 20 years. In addition, I am an Adjunct Professor at the Georgetown University Law Center, where I have taught Fraud and Fiduciary Duties Under the Federal Securities Laws since 2000 and before that, beginning in 1994, The Regulation of Commodity Futures Transactions, which are courses in the Law Center's graduate degree program in Securities and Financial Regulation. I am a Co-Author of *The Securities Enforcement Manual* published by the ABA, *Broker-Dealer Regulation* published by Practising Law Institute, *The Money Manager's Compliance Guide* published by Thompson/West Publishing, and am on the Board of Editors of the *Futures & Derivatives Law Report* published by Thompson/West. I regularly speak at legal conferences on securities and derivatives law issues.

Please advise me if any additional information is needed. My contact information is set forth below.

Respectfully submitted,  
Charles R. Mills

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