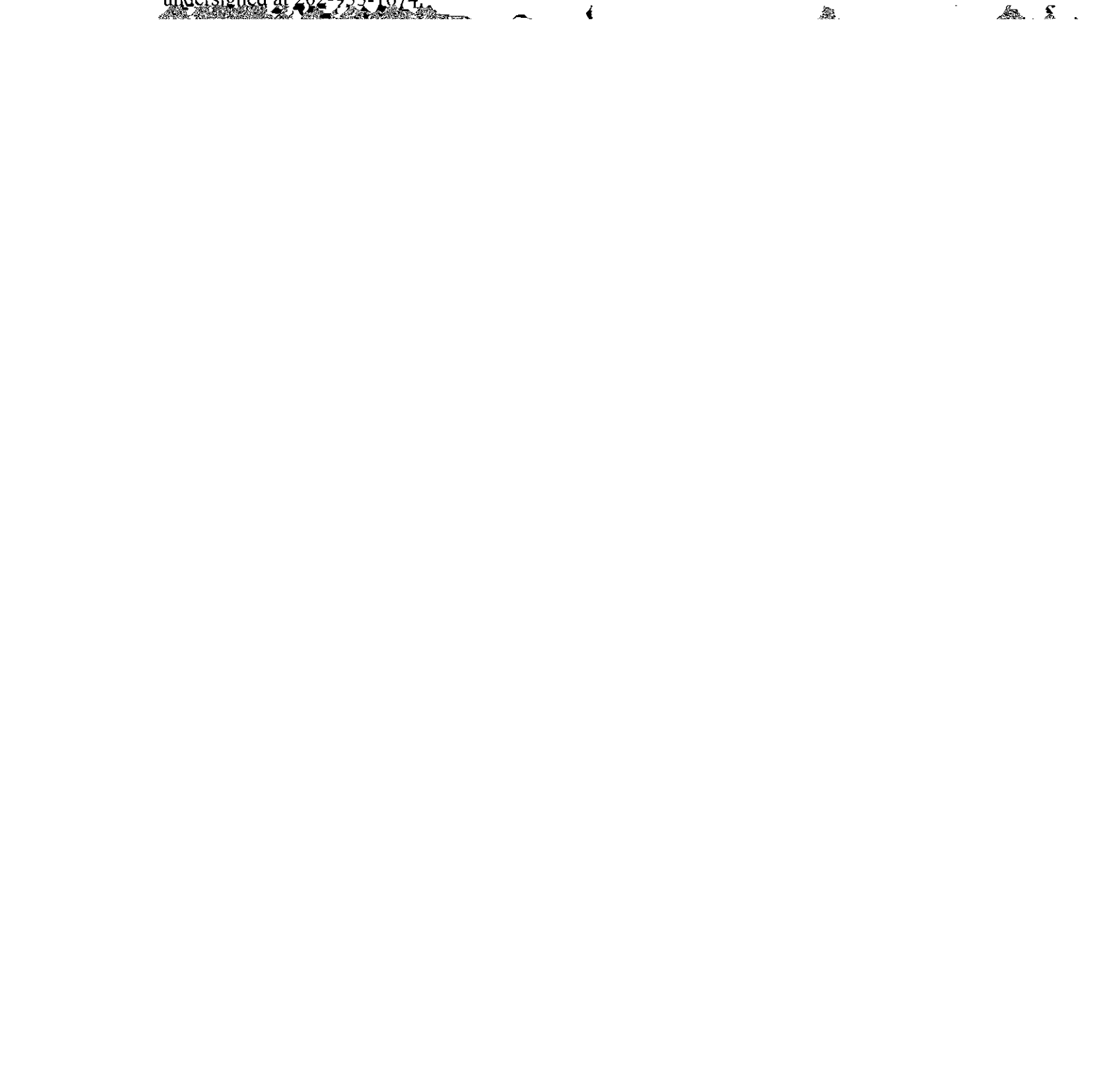




Donald S. Clark  
December 13, 2010  
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If you have any questions concerning this filing, please do not hesitate to contact the undersigned at 202-955-1674.



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... that Staff had received consent authority from the Director of the Bureau of Consumer Protection.



Albert Gonzalez as a victim of Gonzalez's hacking ring,<sup>12</sup> Director Vladeck stated that he was "offended" that Hannaford referred to itself as a "victim" in this matter."<sup>13</sup>

At the conclusion of the meeting, Hannaford's representative and its counsel were informed that the BCP would request that the Commission authorize the filing of a complaint against Hannaford, and indicated that Hannaford should prepare for meetings with individual Commissioners that were likely to occur in late September of 2010. However, on September 1, 2010, Hannaford's counsel received a call from Staff stating that they now had authority to agree

to a settlement that did not name Hannaford. Staff also stated that the settlement







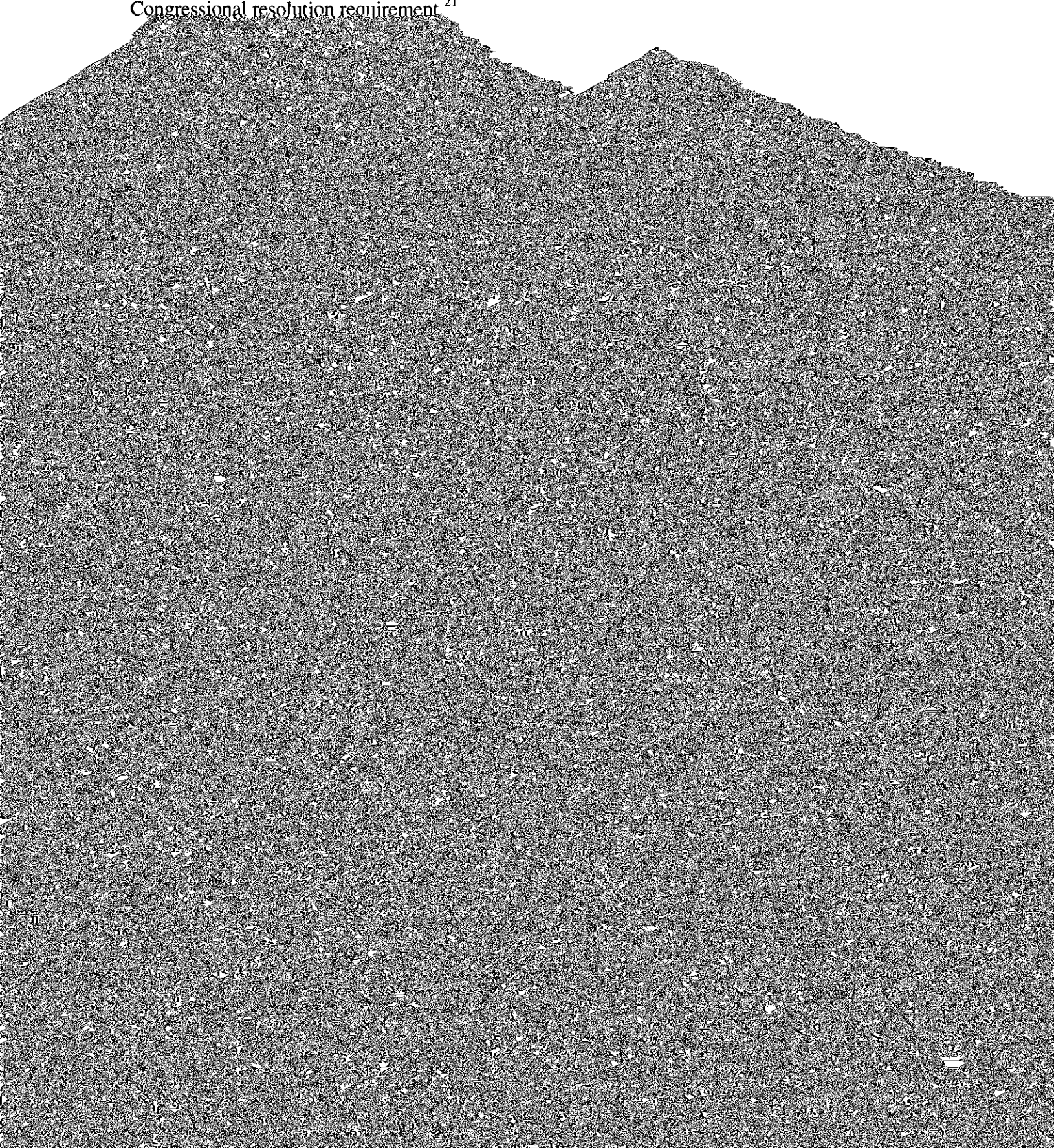








§ 45 as amended.” This resolution is so broad that it apparently would allow the Commission to investigate any person with respect to anything. Such a broad resolution is inconsistent with the Congressional resolution requirement.<sup>21</sup>





which, as demonstrated above, say nothing at all about any alleged conduct. Thus, nowhere is the conduct constituting the alleged violation made known.

Staff may claim that Hannaford knows what they are “really” looking for, and that this clear violation of FTC rules and procedures should be ignored. But the concern is not















the CIDs were issued to allow the Commission to avoid two-year discovery overruns by an



















