

Criminal subjugation and gypsy peoples: an analysis of the biographical construction of a popular leader in criminal records

Sujeição criminal e povos ciganos: uma análise da construção biográfica de um líder popular nos registros criminais

Rafael Batista Gonçalves

Universidade Federal de Jataí, Jataí/Goiás, Brasil.

<https://orcid.org/0009-0006-2991-7025>

rafael.goncalves@discente.ufj.edu.br

Divino Borges da Silva

Universidade Federal de Jataí, Jataí/Goiás, Brasil.

<https://orcid.org/0009-0002-1591-203X>

divinocigano10@hotmail.com



Prof. Dr. Phillipe Cupertino Salloum e Silva

Universidade Federal de Jataí, Jataí/Goiás, Brasil.

<https://orcid.org/0000-0003-1602-8481>

phillipe.silva@ufj.edu.br

Abstract

This article describes and analyses how the biographical construction and criminal subjection of a popular Gypsy leader can occur in the documents produced in the context of a real trial that took place before a jury. Based on an ethnographically inspired study with a critical legal sensibility, the narratives and meanings present in the criminal records were analysed, as well as the media repercussions surrounding the case study. In this sense, it was possible to reflect on how the leader of a particular traditional community, as a gypsy, is inserted into the case file and how the cultural differences, stigmatisations and social representations associated with his ethnic condition emerge in the procedural dynamics. It has been empirically verified that the biographical construction that takes place in the case files analysed has moved away from the field of individualisation of punishment and is materialised in the criminal subjection of the Gypsy community.

Keywords: Anthropology of Law. Judicial biography. Criminal registries. Gypsy peoples. Justice system.

Resumo

Este artigo descreve e analisa como a construção biográfica e a sujeição criminal de um líder cigano popular podem ocorrer nos documentos produzidos no contexto de um julgamento real que aconteceu perante um júri. Com base em um estudo inspirado na etnografia e com uma sensibilidade jurídica crítica, foram analisadas as narrativas e significados presentes nos registros criminais, bem como as repercussões midiáticas em torno do estudo de caso. Nesse sentido, foi possível refletir sobre como o líder de uma determinada comunidade tradicional, enquanto cigano, é inserido no processo e como as diferenças culturais, estigmatizações e representações sociais associadas à sua condição étnica emergem na dinâmica processual. Foi verificado empiricamente que a construção biográfica que ocorre nos autos analisados se distancia do campo da individualização da pena e se concretiza na sujeição criminal da comunidade cigana.

Palavras-chave: Antropologia do Direito. Biografia judicial. Registros criminais. Povos ciganos. Sistema de justiça.

1 - Introduction

At the beginning of February 2020, a Gypsy camp was attacked¹; after a shoot-out, four people lost their lives, one of them a local resident. For about six years, this area has been home to dozens of families, including children, teenagers and the elderly, linked by family ties, mostly traders and informal workers, from selling and exchanging cars to selling dishcloths at street markets. It is an emblematic and symbolic space for the struggle for human rights of the Brazilian Gypsy population, and is the headquarters of the organisation responsible for drafting the most important bill in the National Congress aimed at this population. It is one of the few areas in the country to have been conquered through political negotiations, resulting in an administrative treaty granting collective ownership for housing purposes, through the intervention of the Superintendence of Patrimony of the Union.

The aim of this paper is to try to understand the practices of the judicial system and the media in producing meanings about the episode of violence that took place in the camp, which resulted in the criminal trial and pre-trial detention of one of Brazil's most prominent Gypsy leaders. To reflect on how a popular Gypsy leader is inserted into the case file and how cultural differences, stigmatisation and social representations associated with her ethnic condition emerge in the procedural dynamics.

1 In order not to compromise the understanding of the analytical objectives of this article, the identity of the popular leadership will not be revealed, nor will it be specified in which federation unit or place exactly the event studied for academic and scientific purposes took place.

The case under study involves different narratives, from the press to the judiciary and the police, which has made it possible to mobilise the documentary ethnographic perspective, integrated with the participant observation of the authors who acted in the technical-political defence of the accused, to describe and analyse how the disputes over the biographical construction of the popular leader are played out in the penal context. As a theoretical backdrop, we dialogue mainly with Michel Misse's notion of criminal subjection in order to interpret the empirical data made possible by the ethnography of state practices and the press, which archive lives, produce subjects and collectivities by documenting and processing facts that can be imputed as crimes.

2 - Legal and anthropological sensitivity

The fieldwork carried out here consisted mainly of a detailed description and analysis of a series of documents, both primary and secondary, of various types. Documents of state origin, related to the judicial system (the criminal investigation, the complaint by the Public Prosecutor's Office, the series of steps taken by the judiciary, including the decisions taken) and documents from the media. Also analysed as a document, as part of the ethnography, is a scientific article that also reports on the case analysed here, sharing original records, such as letters and excerpts from open conversations, referring to the search for help by the daughter of the popular leader and the institutional dialogue with the Federal Public Prosecutor's Office to intercede for her release (Nochi 2021).

The empirical research and ethnography was mainly made possible by privileged access to information, reports and testimonies from family members and from the popular leadership itself involved in the criminal justice system, which facilitated the textualisation of the processes and plots analysed. The main challenge was to try to bring the perspective of the accused into the criminal process.

This is a very fruitful approach for legal research, because the empirical perspective typical of anthropology allows us to access the meaning of practices from the point of view of those involved, offering more concrete elements to broaden our understanding of the field of law, in other words the functioning of legal institutions, bodies and the actions of those involved (Nocchi 2021: 1).

The familiarity with the case analysed stemmed precisely from the authors' proximity to the leader, through friendship, political and academic relations, or participation in the habeas corpus petition on his behalf. This enabled them to get to know the situation better and to access the narrative of the denounced person. But also family testimonies expressing the fear, suffering and sense of injustice caused by the arrest. One story in particular stands out from the dialogue between Nocchi and the leader's daughter, who recounts how she found out about her father's arrest by phoning one of her sisters:

(...) I was in the shop with my daughter. When suddenly my sister called and started screaming, screaming, my younger sister: 'my father, my father'. I thought my father had died. I can't explain the feeling. I know that I sat on the ground on the kerb and said: 'Speak...'. And she said 'my father has been arrested'. I'll tell you the truth, at that moment, when she said he'd been arrested, it was a relief for me. I said, 'What do you mean my father has been arrested? It's a mistake'. She said 'they're making a mistake, my father said it was their mistake and they took my father, they took my father's hat'. My father's hat... My father has been wearing a hat since we were born. It's his trademark. They've taken my father's hat, they've taken my father', shouting a lot. I said 'it was a mistake'. And she said, 'That's what my father said. My father said that the police came and told him his name. He replied: 'Yes, sir, it's me'. My father was in front of their house, fiddling with his mobile phone, in the group. Then he said, 'You're being taken to the police station. You're under arrest'. He said: 'Yes, I will, but it's a mistake, gentlemen, I don't owe anything to the courts, I haven't done anything wrong, but let's go, let's go there, when we get there you'll see it's a mistake, there's something wrong'. My father believed that he would come back at the same time. He kept reassuring my sister and granddaughter: Calm down, my daughter, calm down, my daughter, I'll be back soon (Nocchi 2021: 6).

The hat is a symbol of gypsy culture, which is very strong in the central-western region. The moment of arrest and the removal of the accessory symbolise the beginning of a series of dehumanising acts, from the press reports and especially the arrest, to the criminal process as a whole, which in the case of Brazil reproduces an inquisitorial ethos (Lima; Mouzinho, 2016).

As Kant de Lima and Bárbara Baptista (2018) point out, inspired by the question of "how anthropology can contribute to legal research", the choice to carry out fieldwork, and especially ethnography, allowed us to experience the materialisation of the law and to note that the theoretical discourse produced in doctrine, in theories about human rights, does not always "find a correspondence in judicial practice, and vice versa" (Lima & Baptista 2018: 14).

The scientific work carried out here makes it possible to measure the impact of the trial on the life of the person who is the target of the criminal proceedings, i.e. the defendant. And its impact on the community, in other words, what all the punitive behaviour promoted by the state can mean for the Gypsy people. Bringing anthropology and law together is not just about sensitising judges, lawyers or paralegals to forensic meanings and cultural aspects, as the field is often expected to do. It is about engaging with the voices and interests of those who have least control over what is produced and reported.

In the spirit of Paula Miraglia (2005), our approach is to observe the law in operation, and to stress the value of ethnographic research in fostering the anthropological analysis of legal facts through the study of legal and judicial institutions. Rather than naturalising the law and its dogmatic constructions, it seeks to show it as a construction based on and guided by a specific set of values, which can therefore be relativised, questioned and challenged.

What was originally intended to be a study of criminal records, analysing the procedural documents, was extended to include the repercussions of the case in the press, due to the large number of news stories published, which also produce legal meanings about the episode through what is said and, above all, what is not said in the newspapers.

3 - The uses of sensationalism by the press

There have been several reports in local newspapers and on television about violent incidents in this camp. In general, the news reported that four people had died as a result of a shootout over a failed car deal that was to be stolen. However, what was most emphasised in the news coverage was the fact that the incident took place in a camp where a gypsy community lived. This issue was widely explored by the newspapers, as is usual when reporting on situations involving this ethnic group (Gomes 2013, Sarmiento 2021, Salloum e Silva *et al* 2024).

Seven months later, the main leader of the area was arrested on remand. Initially considered an informer, he was considered a possible perpetrator in the civil police investigation, charged and later tried for murder. In this sense, the local leader took part in two trials: one related to the killings that took place in the camp, and the habeas corpus trial, due to the fact that he had been detained for about six months,

his freedom having been obtained in the Superior Court of Justice (STJ), following the refusals of the Court of First Instance and the First Collegiate Court.

In the case of the trial by jury, which has two stages, the trial of the leaders was held only at the charge stage and did not proceed to the trial by jury stage. This is because, four years later, the Court sentenced him to imprisonment, which is what happens when the prosecuting judge is not convinced that the facts constituting a crime exist. Or, in this case, because there was insufficient evidence of the leadership's authorship or involvement. However, what the leadership claimed from the beginning did not prevent them from spending some time in prison even before the trial was completed.

The statement to the police in February 2020, still at the police investigation stage, made some statements that are highlighted here to understand the case from the leadership's version: "that he has lived there since 2014; that he is aware that the motivation for the events has nothing to do with the car trade, although they know that some of the residents of the settlement have businesses related to cars"; that at the time of the invasion and when the shooting started, he was resting after lunch when he heard "many shots" and saw his nephew "lying on the ground, wounded". He reiterates that he "does not believe that the events occurred because of theft" and that the incident was an isolated tragedy².

The interlocutor is not only defending himself from an individual point of view. What predominates in the statement is the attempt to dissociate the community's livelihood, which is trade and the exchange of goods, such as cars, as an illegal practice. And at the same time to protect the inhabitants and the community in general. On the other hand, what we see at the level of the media, in the published reports, is that this version is completely ignored, as well as other versions from the local residents.

A narrative is chosen and a line of thought adopted from journalistic texts in general, i.e. that there was a trap, that outsiders were lured into the camp and that they were attacked by people from the gypsy community. Any other hypothesis or perspective on the case is ignored. For example, the thesis that the camp was invaded, since it is an open area without walls and anyone can easily enter it; that the invaders started the shooting, that they entered the community's land with this in-

2 Criminal case no. 0000859-31.2020.8.07.0006.

tention, since they were wearing bulletproof vests; that there was self-defence on the part of those who returned fire to protect themselves and other residents, since there were many children, teenagers, women and also elderly people living there.

Other possible versions are not only ignored. There is no mention or emphasis in the reports on the history of the community and, in particular, of the leadership in question in the struggle for human rights, which has a national reach. There is also no mention of the educational and cultural activities that took place in the camp, which was constantly visited by schools and universities for extension and research activities. This information appears only in the judicial process, from the habeas corpus, as discussed in the next topic. The political commitment of the leader was underlined by his daughter when she asked the MPF to intervene:

My father is known throughout Brazil and the world for his commitment to the Gypsy people. We are a nomadic people, not because we want to be, but because we have always lacked the conditions we need. We have always been invisible and persecuted for this. Please, Dr Eliane Torelly, help us. We count on your support and understanding.' (Nocchi 2021: 4)

As Mariza Peirano argues, 'good ethnography lies in overcoming common sense about the use of language.' In this way, noticing the unspoken in the context being observed is as important as identifying the discourses expressed in the texts reproduced in both newspapers and justice, because 'words are not the only means of communication: silence communicates' (2014: 386).

The fact is that the history of the community and what this territory symbolises for the struggle for Gypsy rights is not difficult to access. It is public data, as there are a considerable number of reports available on the Internet. There are also a number of academic publications that mention the community and its importance for Gypsy studies in Brazil. However, for journalistic purposes, these are not relevant sources or information; there is not even an attempt to contextualise the reality of the group, to take into account the historical vulnerability of Gypsies in society.

It's a paradox. On the one hand, there are positive records of years of political action in favour of human rights, easily accessible on the Internet. On the other hand, because of the episode of violence in the camp, there are journalistic texts that contribute to the construction of negative images of the Gypsy community as a group of people who are essentially dangerous and prone to crime.

This paradox in the way information and meanings are produced about the camp and the Gypsies provided the first insight into the construction of the object of study from an anthropological point of view. The empiria, here the events, happenings, words and texts, everything that affects the senses, as Peirano says, is the material that is analysed for research purposes and that “is not just collected data, but questions, a source of renewal” (2014, p.380), as ethnographic facts.

By analysing the reports and the criminal records as documents, it was possible to identify a series of practices carried out by both the journalists reporting the episode and the justice system, which in the everyday life of these worlds, journalistic and forensic, as well as in the investigative field of the police, may seem commonplace and end up being normalised. By equipping ourselves with the anthropological gaze, which is essentially a gaze marked by strangeness, but not in the sense of suspicion, “but of seeking to be surprised by everything that seems natural to our eyes” (Lima & Baptista, 2018).

In this sense, by describing and analysing all the reports on the episode, covering the first two weeks after the violence in the Gypsy camp, and comparing them with the information in the court case, attention is drawn to the sources used to prepare the reports. This is an opportunity to consider who the main informants are in the media analysed, how they access the stories and how they transmit the news.

Firstly, it can be seen that the majority of the reports do not tell us who the sources of the news are, and this is therefore omitted. Inaccurate and even untrue information is even broadcast. For example, the *Correio Braziliense* report titled “after massacre, gypsies abandon camp” contains the following information: “Around 200 people lived there”, when in fact there were around 70 people and 18 family units (Perpétuo 2017)³.

There is another equally relevant fact that has been observed in this and other reports: the way in which the verb ‘to leave’ is used and the lack of any consideration of the reasons given by the inhabitants to justify the community’s departure from the area. The fact that the context of the move is not explored contributes to reinforcing the social representation of Gypsy nomadism as an inherent character-

3 This is confirmed by the authors of this article. They know the camp and speak directly with the main leaders of the area.

istic of their culture, making them unreliable people because they are constantly on the move.

It should not be overlooked that common sense generally defines Gypsies as nomads, and nomadism is a cultural institution that cannot be separated from Gypsy culture, otherwise it would be completely misrepresented. On the other hand, “nomadism is rather a product of representations elaborated in the interactions (field of forces) between Gypsies and Gadjé⁴, objectified in stereotypes, emblems, categories, actions and feelings” (Rezende 2000: 112).

In general, the reports tend to exploit and emphasise the fact that the people involved are Gypsies, especially in situations of violence and where there are allegations of criminality. This contributes to a sensationalist approach that is practically the norm in crime news. As a result, they reinforce the image of a violent and dangerous people, prone to crime and immoral behaviour.

It is also a feature of what some scholars call ‘penal populism’, which refers to the media’s spectacularisation of crime. The media play an important role in the political, social and cultural spheres of contemporary society, as they influence the population to behave and think in certain ways. Among the topics covered by the media, crime arouses a certain curiosity in the population because it represents a threat to the social body (Honorário Filho et al, 2019).

To illustrate how the sensationalism and spectacularisation of crime is reflected in the reports, we mention four texts published by Grupo Metrópole, one of the largest media groups in the country, which uses the term ‘massacre’ to headline the reports and at the same time categorise and characterise what happened in the camp, as well as the term ‘barbarism’ in the summary of the text, which is highlighted at the beginning of the report.

However, what most impressed the authors was the repetition of the term “massacre”, which appears a total of 8 times, on the page, in the title, in the development of the article, and in the part where the newspaper dedicates itself to leaving other reports that have the same content, all referring to the event that occurred in the camp.

4 In some Gypsy languages it means ‘non-Gypsy person.’

Figure 1 - Records of the use of the term “massacre”⁵ in 4 reports■ **Leia também**

- 1 “Provas frágeis”, diz juíza ao soltar acusado de **chacina**
- 2 Briga por carro motivou **chacina** em acampamento cigano
- 3 “Achei que eram fogos de artifício”, diz morador após **chacina**
- 4 Após **chacina**, PC apreende 4 carros e joias de ciganos suspeitos

Reference: Own collection (2024).

In all the reports analysed, the term “massacre” was used 34 times, which is a source of surprise and relativisation for research purposes and theoretical-ethnographic formulations, since relativisation is “an epistemological attitude, eminently anthropological” (Oliveira 1996: 30). It was found that the use of this term in the press differs from the meaning attributed to it in dictionaries and academic texts. Michaelis, an important dictionary of the Portuguese language, defines massacre as “murder on a large scale, with mutilation of corpses or any other kind of cruelty or violence”. In academia, massacre is usually used to denounce mass deaths of historically oppressed subjects in society, such as homeless people, or in the context of social struggles, such as agrarian conflicts.

Report 4, shown in Figure 1, adopts a narrative that suggests from the title that the suspects are local gypsies. This is not mentioned in the report, which simply describes what was found at the scene and that the police are looking for other suspects. In the end, the journalistic method constructed and reinforced the theory that the Gypsy were the perpetrators of the “massacre”, linking them directly to the cars and jewels found at the scene. The police confiscate any object of value, such as jewelry, which is a sign of the gypsy culture present in many communities, and which is inevitably seen as the result of criminal activity, regardless of the context.

Comparatively speaking, while an investigation usually takes months to complete, while legal proceedings in cases of crimes against life take years to begin and even longer to reach a final verdict, the use of time by the media is completely different. News is published immediately, while investigations take place which have legal consequences for those linked to the alleged crimes. It cannot be ruled out that the trials will be influenced by the reports.

5 “Massacre” means chacina in portuguese.

It is clear that procedural guarantees such as adversarial proceedings, full defence, due process and fundamental principles do not guide the dynamics of how newspapers operate when reporting crimes. In this particular case, it is clear that the journalistic texts analysed do not show any concern for the human rights of the Gypsy population, and the priority is to attract readers' attention, even if this means reproducing stigmas, using techniques that provoke moral panic and a sense of fear in society towards the "other Gypsy". This is the *modus operandi* of conventional news portals, which are based on market logic, as they are above all looking for readers and more access.

Based on an empirical study that analysed 215 articles mentioning Gypsies in the three states where this population is most concentrated, Minas Gerais, Goiás and Bahia, it was found that 140 corresponded to articles related to criminal practices, concluding that "65% of the journalistic articles published represent these subjects as murderers, criminals; drug dealers; thieves; dangerous; violent; kidnappers; aggressive; vengeful; fraudsters; opportunists; explosives; irresponsible; unbalanced; wanderers; swindlers; cruel" (Sarmiento 2021).

In the case under analysis, it is clear that the media reporting on the events in the camp take one side and one version, and this coincides with the accusatory perspective. A report in the newspaper *Metrópoles*, published in the same week as the incident, mentions the phrase "weak evidence" in the title and throughout the text, to inform that the judge in the case had acquitted the accused of the "massacre in a gypsy camp" and that it was therefore "haunting the region". A second report from the same portal states that "people who know the gypsies involved in last weekend's brutal case are afraid (...) the fear increased after the court decided to release one of the three accused".

In the same vein, the news portal "Egnews", a smaller newspaper, published a report with the following title "Family of man killed in massacre will move out of fear of gypsies". Despite the choice of a one-sided narrative and the version that later supported the public prosecutor's complaint, the body of the journalistic text contains discourses that promote negative representations of Gypsies in general. Note: "He (the victim) told me that these people (the gypsies) were very bad and that if he told the police from whom he had bought (the car), he would certainly die".

Knowing other perspectives on the episode that took place in the camp allows us, in this article, to question the very notion of 'victim' used in the report above. And,

once again, to note the silencing of the local population. In addition to the death of a family member, this event has affected the lives of dozens of people. Whole families, including those with young children, had to find another place to live overnight, as they were forced to leave the place where they had been living in a community since 2014. In other words, there has been an impact on the social and political organisation of the group itself, as staying in the camp has become impossible due to insecurity. Data that is completely ignored in the series of journalistic texts produced.

These years of pre-trial detention and uncertainty about whether he would be found guilty or not, until his acquittal, have added an extra dimension to his suffering and, consequently, to his sentence. He now has to live in a rent-controlled flat, something he did not do previously, and he has to revive his political activities, which were paralysed by the criminal proceedings against him.

4 - The archiving of life through criminal proceedings

This research is based on the assumption that the Brazilian legal field has difficulties in carrying out empirical research and in considering the data from this type of research as valid. This is due to the series of epistemological obstacles imposed by legal logic, which makes the field of legal studies hostage to what is established as sources of law, especially in the field of ought. As Varella and Kant de Lima (2008) argue, the flight from the present reality in legal investigation leads to a lack of data on reality and to the theoretical fervour of legal investigation, which implies a convenient renunciation of the world, specificities and empirical diversity, remaining only with the mirror that constantly returns the desired image.

To develop this scientific work, as mentioned in the previous topic, documents belonging to the area of Law studies were analyzed, namely the case files, which were handled as fieldwork. Reading documents is also ethnography, “it is like being lost in a sea of papers, stamps and covers” (Renoldi et al 2021), from the perspective that analyzing criminal records, in the case of this research, is like going to the Trobriand Islands⁶.

If we try to understand the process, we realise that in the criminal record the life of the subject is archived as a defendant. In this way, a biography is constructed

6 Malinowski's fieldwork in the Trobriand Islands led to one of the great classics of 20th century anthropology, *Argonauts of the Western Pacific*. Today, anthropology is no longer the study of distant societies, but of a much wider universe.

on the basis of data selected to defend, accuse or judge, and thus a procedural truth is produced in the eyes of the state, which has a monopoly on the exercise of justice in modern society.

The act of archiving life is also present in the way documents are created and registered in the process, as well as in the need that arises in the records to generate images of the character/defendant in question. Scaramella distinguishes the archiving of life in the judicial context from the act of writing a personal diary, in which ‘the real is manipulated to find the version that best condenses an image of ourselves’ (2015, p.3).

Thus, the intimacy of everyday life is described through the lens of a third party in the documents present in the criminal record. In other words, the third party inserted in the ‘procedural game’ produces meaning about the defendant’s life and intimacy, redefining the ‘biographical self’ on the basis of judicial, extrajudicial and common-sense categories, without giving space to the first person, to the ‘I’, in which the defendant has no voice and is always ‘you/he’ (Scaramella 2015)⁷.

State violence produces meaning and significance, especially when it involves crimes of greater disapproval and/or people who are historically considered “criminal subjects”, because there is a social demand to punish these crimes and these subjects, that is, this criminal subject is reserved for preventive incrimination and, consequently, its physical elimination, as a social “solution” for an “irredeemable subject” (Misse 2011). It has been observed that Gypsies, as a “criminal subject” group, suffer from the consequences of these labels (criminals, dangerous).

As an instrument that can be mobilised and used within the criminal process, the investigation is an important element in the production of the actors’ speeches, in the construction of the characters and also in making them carry all the symbolic effects of being investigated by an institution such as the police (Almeida 2023: 44).

The analysis of the investigation of the case in question, with regard to the narrative of the crime and the Gypsy leader of the camp where the so-called “massacre” took place, as described by the local press, has revealed interesting data on the way in which the incrimination of a person of Gypsy ethnicity is constructed and the way in which his

7 The author makes it very clear that in Brazil, the defendant is always referred to in the third person singular in all documents and even when speaking.

life is outlined. It is important to note that the testimony of only one witness identified the leader of the community as one of the participants in the crime in question. The first time the camp leader is mentioned in the transcripts is in the statement as one of the suspects in the shooting.

He stated in general terms that the Gypsies living there were dangerous people and that it was allegedly the leader of the camp who had started the shooting, saying that during the negotiations the “Gypsy”, in capital letters in the written document, had stated that they should “settle it with bullets”, thus starting the shooting⁸. Furthermore, the characteristic that led the declarant to recognize that the leader participated in the shooting was the fact that he was a man with a “hat and gold teeth”, despite not having been mentioned as participating in the crime in any other testimony.

The recognition by one of the witnesses of a man with a “gold hat and teeth” is not in itself a differentiating factor that points to the community leader as the perpetrator of the crimes, quite the opposite. What can be interpreted from this accusation is the need to punish the community leader as a collective representative, so that he can serve as an example and neutralise the organisation of this undesirable group.

The information provided by only one of the witnesses was sufficient to make the community leader a suspect in the crime, to charge him, and to place him under preventive detention for six months. It was found that his criminal record was attached to the police investigation file, but without specifying the crimes he was alleged to have committed. The criminal record can be read as a life file, since this document contains an excerpt from the gypsy leader’s life, an excerpt made with the intention of proving whether or not the person under investigation is prone to crime. The accused is accused not only on the basis of the fact that is the subject of the investigation, but also taking into account events that are different from the case under investigation.

Considering Misse’s (2010) research on the role of police investigation in incrimination, it can be interpreted that in the case of the gypsy leader, his criminal record aggravates his status as a “criminal subject”. Firstly, there is preventive incrimination simply because he is a Gypsy. They are seen as a group with a “criminal culture”, so that the crime is assimilated to the subject in such a way that his dangerousness, based on what is assumed to be his natural propensity to crime, is proven by both his ethnicity and his criminal record. The judicial biographical production

8 Criminal case no. 0000859-31.2020.8.07.0006.

theoretically begins in the administrative process of investigation, which is not permeated by the sieve of the adversarial system.

The consequence of this biographical sketch was the indictment by the police authority, which stated with certainty that the leader had committed the crimes under investigation, simply because he was recognised by one of the declarants. It is also interpreted that his criminal record was decisive for such an act. “The records archive life and, in doing so, rescue and contrast images chosen according to an intention that does not escape the biographical” (Scaramella 2015: 17). The intention of the police authorities was to prosecute those responsible for the crime. When they came across a Gypsy subject, historically considered dangerous and a born criminal, with a criminal record, and who was cited in the statement as having started the confrontations, they thought it best to charge him.

On 11 September 2020, some seven months after the incident in the camp, the Public Prosecutor’s Office filed a complaint against the camp leader. As mentioned above, the situation led to the deaths of four people in connection with an alleged failed car sale between one of the camp’s residents and one of the victims of the shooting. What is strange about the accusations made by the Public Prosecutor’s Office is that the procedural document does not individualise the behaviour of the accused, stating that when the victim demanded the balance of the money allegedly owed to him, the accused drew their firearms and fired several shots at the victims, who responded by shooting at the accused, resulting in the deaths of three people. It has been noted that the prosecution refers to the accused in general terms.

After the complaint was filed, the judge in charge of the case ordered the preventive detention of the gypsy leader and the other defendants (some of whom lived in the camp). What was remarkable in the analysis was the way in which the request for preventive detention and the decision were based on the fact that the defendants who lived in the camp “had left the district of guilt shortly after the events and could not be found, possibly on their way to the state of Goiás”. On the other hand, according to the accused, they left their place of residence because of insecurity and fear that people related to the victims of the shootings would return to the camp in search of revenge.

Thus, in order to “ensure the application of criminal law” and to “guarantee public order”, the judge ordered the preventive detention of the eight Gypsy from the camp who are defendants in the criminal proceedings relating to the events of early February 2020, including the leader. First of all, the fear and insecurity that led the

Gypsy to leave the camp are ignored. The fact that the Gypsy are seen as a nomadic people, together with the fact that the inhabitants have left the site, has caused discomfort to the public justice system, which sees this as an attempt to exempt itself from criminal responsibility. By being associated with “nomadism”, the Gypsy are seen as people who “do not accept to submit to the norms of a state” (Monteiro 2019: 80).

The abandonment of the site and the possible migration to the State of Goiás can be interpreted in a way that is contrary to what is in the records. “The practices called ‘nomadic’ are not an inherent element of the genetics of the gypsy people, they are the result of social processes” (Salloum and Silva & Figueira 2021: 321), the abandonment of the site by the residents can be interpreted as a reaction to the social process of insecurity.

According to the documents analysed, the inhabitants left the camp two days after the incident, which leads us to believe that the insecurity felt by the group living there was so great that it led them to abandon their home and their belongings and move to a safer place. The abandonment of the place where they lived was not an isolated incident involving the residents who appear as defendants in the case file, but rather a general phenomenon. As claimed by the defence of the defendants in the case:

At no time did the applicant attempt to flee, in fact he lived in the gypsy camp located in Sobradinho, however, he was forced to flee the settlement, as well as the other members of the community after this event occurred, given that the camp does not have sufficient security, putting the life and physical integrity of everyone at risk⁹.

When analysing the case files, it is impossible not to notice that the stigma¹⁰ of nomadism suffered by the Gypsy people was explicitly or implicitly present in the proceedings, since the issue of insecurity and persecution suffered by these people was constantly present in the files in the construction of the leader’s defence. This cannot be ignored, since the fact that the accused did not seem to have a fixed ad-

9 Criminal case no. 0000859-31.2020.8.07.0006.

10 Erving Goffman’s classic text contributes to the reflection on prejudice based on the category of stigma. According to him, “stigma is the situation of the individual who is unable to be fully accepted by society (...) The term stigma is used in reference to a deeply derogatory attribute, but what is really needed is a language of relationships and not of attributes. An attribute that stigmatizes one person may confirm the normality of another; it is therefore neither honorable nor dishonorable in itself” (1988: 7-13).

dress strengthened the possibility of ordering preventive detention. The defendant's defence even uses the requests for institutional support in the area for security purposes in the camp as an argument:

It is also worth mentioning that on several occasions members of the Gypsy community have appealed to the Secretary of State for Human Rights and Racial Equality Policies and Justice and to the Chief Delegate of Decrim to resolve all these issues, particularly with regard to the security of the camp, so that everyone can return to their respective homes¹¹.

During the trial, the defence tried to show that there was an attempt to enter into a dialogue with the authorities in order to provide security and allow them to remain in the camp. The complaint and the preventive detention order suggest that there was no individualisation of the behaviour and that the arrest of the camp leader was part of a process of criminalisation of the community. This is a serious act that, in theory, directly violates the rights and guarantees of the accused in criminal proceedings.

The request to revoke pre-trial detention is a procedural instrument aimed at restoring a person's liberty. This is interesting because when the law considers the social conduct of the accused as a condition for increasing or reducing the sentence, or in this case as a reason for the accused to be able to respond to the trial in freedom, it reveals a biographical intention that is not written by the accused but by third parties. The community leader, the target of the biographical construction, is influenced by social injunctions because he is answering for the crime allegedly committed. However, he does not act or speak in the first person. He is not the one who chooses what remains and what is discarded in this "file" (Scaramella 2015).

In describing the social behaviour of the accused, the document has the biographical intention of archiving his life so that he can respond to the trial in freedom, in contrast to what happens when the accused's criminal record is entered into the files as part of the police investigation. There is an overlap of narratives with different intentions: while the defence tends to want the defendant's freedom, the police authority uses other elements of the defendant's life to request his preventive detention.

The defence presented a portrait of the defendant's personality and life to the court, presenting information such as the fact that the leader is known as a calm and serene person who works for the benefit of the Gypsy community, and that he was the

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proposer of the bill being discussed in the National Congress. The defence also presented the opinions of academics who study Gypsy culture, and stressed that there was nothing to discredit the moral conduct of the community leader as a defender of Gypsy peoples and communities in Brazil. An attempt to justify the unnecessary application of preventive measures, since

In order to understand this life in its essence (and the crime in its enigma), legal agents seek answers in the extension of the trajectory in question, selectively. There is a 'presentification of the past', bringing selected elements of this life and, if necessary, attaching them to the crime or detaching them from the crime" (Scaramella 2015: 18).

In this way, a selection is made of events from the defendant's life and impressions from people who have come into contact with him. The selection made by the lawyer points to the condensed and explanatory nature of the biographical document, as it has great symbolic potential and opens up space for fabrication. The wording of this document, which refers to social behaviour, has the biographical intention of constructing, within the framework of the trial, the narrative of an upright person of great social prestige, so that it is noted in the records that the Gypsy leader is not prone to committing crimes.

Returning to the issue of the lack of individualisation of the behaviour of the accused, it is important to understand the reasons for its non-observance in the case under analysis. The need for a parallel classification of crimes and punishments and the need for individualisation of punishments "will have a very great weight in the whole history of modern criminal law" (Foucault 1987: 83). Reflecting on this guarantee for the Gypsy population clashes with the fact that they are considered to have a criminal culture and to be a priority clientele of the logic of the criminal law of the enemy, which means that their rights are diminished or even disregarded, supposedly in the name of the collective good.

There is a presumption of guilt that materializes in the face of certain racialized people who have been historically stigmatized for being gypsies. After all, it is not possible to presume the innocence of someone who is born guilty. Gypsies are seen as undesirable and are not treated as people because, as the documents analyzed demonstrate, they have been stripped of basic rights inherent to all human beings, such as the presumption of innocence, the right to respond to the process in freedom and the right to be judged according to their individual conduct.

According to Moscovici, Gypsies communities, as a minority, are marginalized from society and can “become scapegoats and be disqualified from living in a community and be considered unfit to live fully (...) every minority is always considered guilty before being judged” (2007: 662). The condition of enemy of Criminal Law imposed by the State, as the holder of the monopoly of violence and the exercise of jurisdiction, became evident from reading the decision that denied the request for revocation of pre-trial detention, which presents the following grounds:

As for the allegation that the defendant has good social conduct, it also does not, in itself, authorize the revocation of the arrest warrant, motivated, as it was, by the need to guarantee public order, given the circumstances already outlined at the beginning of the grounds for this decision. Therefore, given the reasons for the arrest and the absence of new elements to refute them, I DENY the request for revocation of the arrest filed¹².

The above extract from the decision shows that the efforts of the defence were not sufficient to prove that preventive detention should not be used against the accused in the first instance. This did not convince the judge of the need to individualise the behaviour of the accused in the trial, as proclaimed by the legal system and human rights as a legacy of modern law.

In order to eliminate collective criminalisation as a *modus operandi* used to anticipate punishability by imposing a restrictive measure of freedom before the final judgement, it would be necessary to understand the perspective that each of the Gypsies is “a subject who carries the crime in his own soul; he is not someone who commits crimes, but who will always commit crimes, a bandit, a dangerous subject, an irredeemable subject, someone whom one can naturally wish to die, who can be killed, who is killable” (Misse 2010: 21).

The revocation of pre-trial detention in this case took place in the context of double jurisdiction and at the third attempt, in the context of the Supreme Court, since the previous collegiate court had rejected the first appeal. The decision to maintain the pre-trial detention was limited to repeating the reasons given by the judge of the first instance.

In contrast to the first and second rulings that confirmed the detention, the judge, in a one-judge ruling, noted that the file did not mention the community lead-

12 Criminal case no. 0000859-31.2020.8.07.0006.

er, neither in the negotiations leading to the confrontation, nor in the conversations that took place before the shooting, nor any motivation for his involvement. It was stressed that “the application of the precautionary measure went far beyond the assessment of its proportionality and adequacy, in particular because the file does not show the existence of sufficient evidence of authorship and, furthermore, because the essential nature of the measure is not demonstrated”¹³.

The reasons given by the STJ Minister for issuing the habeas corpus order reinforce the thesis of the criminal subjection of Gypsies, who are labelled, stigmatised and typified “in a single social identity, specifically linked to the process of incrimination and not as a particular case of deviation” (Misse 2010: 9). This perspective is in line with Goffman’s (1988) definition of stigma as a characteristic of the subject that, socially transformed into a negative attribute, disqualifies them and creates obstacles to their access to material and symbolic goods¹⁴.

In granting habeas corpus, positive factors external to the criminal proceedings were taken into account. This could have an impact on their work in implementing state policy for preserving and ensuring their identity and cultural survival, particularly because of their leading position¹⁵. In the decision, a different period of the defendant’s life was taken into account than in the first instance judge’s decision, justifying the lifting of the preventive detention.

With the lifting of the preventive detention, the popular leader began to respond to the trial in freedom. In the indictment, the judge of first instance, in the same way as he had decided on the preventive detention, found evidence of authorship and of the materiality of the facts, limiting himself once again to saying that the proof of the gypsy leader’s participation in the crime was the fact that one of the declarants recognised him.

The leader’s defence lodged an appeal against the verdict, prompting the court to analyse the two levels of jurisdiction, which unanimously exonerated the community leader on the basis of a single allegation: that the evidence gathered

13 Habeas corpus no. 649173 (2021/0062636-7).

14 This author explicitly mentions gypsies, along with other social groups (criminals, jazz musicians, bohemians, gypsies, parasites, vagabonds, gigolos, showmen, gamblers, beach bums, homosexuals), as people who are considered to be engaged in a kind of collective denial of the social order.

15 Habeas Corpus nº 649173 (2021/0062636-7).

during the investigation, during the criminal investigation, had not been confirmed by the court. Note:

The fact that one of the victims stated at the police station that one of the perpetrators wore a hat and had gold teeth does not in itself justify his accusation, especially since these characteristics were not confirmed in court and are also common among gypsies. And he was not personally recognised at the police station or in court as one of the perpetrators¹⁶.

Although the popular leader has not been charged, this does not mean that he has not been punished, as he has been pre-trial detained for six months. The trial itself, with its uncertainties, is a form of punishment for the accused, while there is no conclusion. It took four years of proceedings to conclude that the testimony of a single witness was not sufficient to charge the accused.

The extension of elements of the criminal law of the enemy into the criminal law of the citizen is obvious (Jakobs & Meliá 2020). In the case at hand, the inhumanity of the accused leader was demonstrated. It is not a question of punishing a “person”, but a “non-person”, i.e. the “enemy”. The adoption of the enemy criminal law perspective has been verified at various times, in the complaint, in the preventive detention order and in its maintenance until the habeas corpus proceedings before the STJ.

The combination of a dangerous and criminal image of Gypsies and an inhumane penal code, which disregarded human rights and due process, theoretically allowed for a series of exceptional measures. A clear attempt to incriminate the Gypsies as a collective, through the leader and the other inhabitants of the camp.

Final reflections

This empirical research has shown that there is no such thing as the presumption of innocence and the individualisation of punishment, procedural guarantees that have constitutional status, when the state judge is mobilised to intervene in conflicts involving Gypsy individuals and groups. And before the state judge himself conducts the trial, since he has a monopoly on jurisdiction, it is the media who promote their own trials, with speculations that seem like absolute truth.

16 Appeal in the strict sense No. 0708182-46.2020.8.07.0006.

Despite the differences in practice and ethics that characterise the professional fields of journalism and law, there is a common element in these universes that has been crucial to this research. The production of meaning and the search for truth, whether real or procedural, are carried out with minimal participation of the people who are the objects of the news, the criminal investigation and later the judicialisation. Third parties dominate the construction of narratives. In the case of the judicial process, this is even more evident, since the defendant's participation in the dynamics of the process is mostly indirect, through his lawyers. On the basis of the study carried out, it was empirically established that the biographical construction that took place in the records analysed moved away from the field of individualisation of punishment and materialised in the criminal subjection of the Gypsy community.

The criminal trial has given rise to a battle of narratives, in the form of biographical construction, by the various subjects of the trial, be they the defence, the prosecution or the judiciary, which has promoted the archiving of the life of the accused in the trial by third parties, without the accused being able to exercise control over the information about his life and the facts that have been recorded. The non-indictment and the consequent declaration of the popular leader's innocence, after four years of proceedings, do not erase the fact that the Brazilian State has promoted a series of acts of violence and violations of human rights, not only against the person accused, but also against the entire ethnic group surrounding him, to the extent that the principle of individualisation of punishment has been suspended, only to be reversed in the exercise of double jurisdiction.

Bibliographic references

ALMEIDA, Tamiris Gonçalves. *Construções biográficas e práticas jurídicas criminais: uma análise etnográfica do caso do ex-PM Pitbull*. 2022. Dissertação (Mestrado em Antropologia) – Universidade Federal do Rio de Janeiro, Rio de Janeiro, 2022.

ARTIÈRES, Philippe. *Arquivar a própria vida*. Revista Estudos Históricos, v. 11, n. 21, p. 9-34, 1998.

FOUCAULT, Michel. *Vigiar e punir: história da violência nas prisões*. Petrópolis: Vozes, 1987.

GOFFMAN, Erving. *Estigma: notas sobre a manipulação da identidade*. Lisboa: Coletivo Sabotagem, 1988.

- GOMES, Sílvia. *A construção do pânico moral sobre os ciganos e os imigrantes na imprensa diária portuguesa*. *Latitude*, v. 7, n. 2, p. 187-217, 2013.
- HONORIO FILHO, Simplicio et al. *Populismo penal midiático: exploração midiática da criminalidade e a espetacularização do crime*. *Revista Brasileira de Estudos de Segurança Pública*, v. 12, n. 1, p. 76-91, 2019.
- JAKOBS, Günther; MELIÁ, Manuel Cancio. *Direito penal do inimigo: noções e críticas*. Porto Alegre: Livraria do Advogado, 2020.
- LIMA, Roberto Kant de; MOUZINHO, Glaucia Maria Pontes. *Produção e reprodução da tradição inquisitorial no Brasil: entre delações e confissões premiadas*. *Dilemas – Revista de Estudos de Conflito e Controle Social*, v. 9, n. 3, p. 505-529, 2016.
- LIMA, Roberto Kant de; BAPTISTA, Bárbara Gomes Lupetti. *Como a Antropologia pode contribuir para a pesquisa jurídica? Um desafio metodológico*. *Anuário Antropológico*, v. 39, n. 1, p. 9-37, 2014.
- LIMA, Roberto Kant de; VARELLA, Alex. *Saber jurídico e direito à diferença no Brasil: questões de teoria e método em uma perspectiva comparada*. In: LIMA, Roberto Kant de (org.). *Ensaio de Antropologia e de Direito: acesso à justiça e processos institucionais de administração de conflitos e produção da verdade jurídica em uma perspectiva comparada*. Rio de Janeiro: Lumens Juris, 2008. p. 89-126.
- MIRAGLIA, Paula. *Aprendendo a lição: uma etnografia das Varas Especiais da Infância e da Juventude*. *Novos Estudos Cebrap*, n. 72, p. 79-98, 2005.
- MISSE, Michel. *Crime, sujeito e sujeição criminal: aspectos de uma contribuição analítica sobre a categoria bandido*. *Lua Nova*, n. 79, p. 15-38, 2010.
- MISSE, Michel. *O papel do inquérito policial no processo de incriminação no Brasil: algumas reflexões a partir de uma pesquisa*. *Sociedade e Estado*, v. 26, n. 1, p. 15-27, 2011.
- MONTEIRO, Edilma do Nascimento Jacinto. *Tempo, redes e relações: uma etnografia sobre infância e educação entre os Calon*. 2019. Tese (Doutorado em Antropologia) – Universidade Federal de Santa Catarina, Florianópolis, 2019.
- NOCCHI, Carolina Penna. *‘Chapéu e dentes de ouro’: a dimensão simbólica dos direitos e sua repercussão na prisão e liberdade de um cigano*. In: SCHRITZMEYER, Ana Lúcia Pastore (org.). *VII Encontro Nacional de Antropologia do Direito*. São Paulo: Núcleo de Antropologia do Direito, 2021. p. 1-15.
- OLIVEIRA, Roberto Cardoso de. *O trabalho do antropólogo: olhar, ouvir, escrever*. *Revista de Antropologia*, p. 13-37, 1996.

PEIRANO, Mariza. *Etnografia não é método*. Horizontes Antropológicos, v. 20, n. 1, p. 377-391, 2014.

PERPÉTUO, Lenilda Damasceno. *Comunidade cigana Calon em processo de escolarização: conflitos étnicos e saberes pluriculturais*. 2017. Dissertação (Mestrado em Antropologia) – Universidade de Brasília, Brasília, 2017.

REZENDE, Dimitri Fazito de Almeida. *A identidade cigana e o efeito da 'nomeação': o deslocamento das representações numa teia de discursos mitológicos-científicos e práticas sociais*. Revista Antropol., v. 49, n. 2, p. 698-729, 2006.

RENOLDI, Brígida et al. *El antimétodo etnográfico – desafíos para una forma de trabajo*. Etnografías Contemporáneas, v. 7, n. 13, p. 8-35, 2021.

SALLOUM e SILVA, Phillipe Cupertino et al. *Representações sociais dos povos ciganos nos veículos de imprensa do Estado de Goiás (2018-2022)*. InSURgência, p. 1-25, 2024.

SARMENTO, Anaíra Sousa de Moraes. *Representações sociais dos povos chamados 'ciganos' em jornais brasileiros (2008-2018)*. 2011. Dissertação (Mestrado em Sociologia) – Universidade Federal de Santa Catarina, Florianópolis, 2011.

SCARAMELLA, M. L. *A produção de biografias judiciais em autos de processos penais: uma análise dos laudos psiquiátricos do caso Maura Lopes Cançado*. Confluências – Revista Interdisciplinar de Sociologia e Direito, v. 17, n. 3, p. 14-34, 2015.

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