



Office of the Secretary

UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

June 2, 2015

Jacquie Murphy
Commonwealth of Massachusetts

Re: *In the Matter of Finance Select, Inc., FTC File No. 1323262*

Dear Ms. Murphy:

Thank you for commenting on the Federal Trade Commission's proposed consent agreement in the above-referenced proceeding. The Commission has placed your comment on the public record pursuant to Rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii), and has given it serious consideration.

As we understand your comment, you wish for the Commission's news release about the matter to name the individuals that own and operate the respondent company charged in the proposed complaint. You do not propose any revisions to the proposed complaint or the consent agreement.

The Commission thanks you for submitting your comment. It is not Commission policy to name non-respondents in news releases, due to concerns about unnecessarily disclosing details about non-public investigations or potentially impugning the reputations of non-respondents.

After consideration of your comment, the Commission has determined that the relief set forth in the proposed consent agreement is appropriate and sufficient to remedy the violations alleged in the proposed complaint. Accordingly, the Commission has determined that the public interest would best be served by issuing the Decision and Order in this matter in final form without modification. The final Decision and Order and other relevant materials are available from the Commission's website at <http://www.ftc.gov>. It helps the Commission's analysis to hear from a variety of sources in its work, and we thank you again for your comment.

By direction of the Commission.

Donald S. Clark
Secretary



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Thomas Rivet
State of New York

Re: *In the Matter of Finance Select, Inc., FTC File No. 1323262*

Dear Mr. Rivet:

Thank you for commenting on the Federal Trade Commission's proposed consent agreement in the above-referenced proceeding. The Commission has placed your comment on the public record pursuant to Rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii), and has given it serious consideration.

Your comment expresses support for the Commission's action. Specifically, you state that you want the Commission to "accept [your] vote FOR this ruling" and that you "fully and completely support this move by the FTC" into this area of enforcement. You explain that advertisements for these types of loans have become problematic in the depressed area of upstate New York where you reside. Additionally, you do not propose any revisions to the proposed complaint or consent agreement.

The Commission thanks you for your comment and expression of support. The proposed complaint and consent agreement should help address some of your concerns with regard to title loan advertising. Specifically, the Commission's proposed complaint alleges that Finance Select deceptively advertised car title loans at a 0% interest rate without adequately disclosing that the 0% offer was subject to significant qualifications. To prevent this kind of deception going forward, the proposed consent agreement requires Finance Select to clearly and conspicuously disclose all material qualifying terms associated with obtaining the loan at its advertised rate.

After consideration of your comment, the Commission has determined that the relief set forth in the proposed consent agreement is appropriate and sufficient to remedy the violations alleged in the proposed complaint. Accordingly, the Commission has determined that the public interest would best be served by issuing the Decision and Order in this matter in final form without modification. The final Decision and Order and other relevant materials are available from the Commission's website at <http://www.ftc.gov>. It helps the Commission's analysis to hear from a variety of sources in its work, and we thank you again for your comment.

By direction of the Commission.

Donald S. Clark
Secretary