



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

Division of Financial Practices
Bureau of Consumer Protection

Peggy L. Twohig
Associate Director

April 3, 2009

Dear Sir or Madam:

This letter is to advise you that you have marketed mortgage loan modification or foreclosure assistance services in a potentially deceptive manner.

The Federal Trade Commission, the nation's consumer protection agency, enforces laws that prohibit unfair or deceptive acts or practices in or affecting commerce. The FTC Act requires that advertising, including claims about loan modifications and foreclosure assistance, be truthful and non-deceptive.

FTC staff attorneys have read your materials as part of a review of marketing practices in the mortgage loan modification and foreclosure assistance area. Our review focused on identifying potentially deceptive claims targeted at financially distressed homeowners, including, but not limited to:

- guaranteeing or representing a high probability of success in achieving mortgage relief;
- falsely representing that homeowners have been approved for a loan modification;
- falsely representing that homeowners will get specific reductions in their mortgage payment amount or a specific interest rate;
- falsely representing an affiliation with free services, such as the HOPE NOW Alliance, a broad-based coalition of HUD-certified housing counseling agencies and mortgage industry members that offers free assistance to homeowners;
- falsely representing an affiliation with the federal government or federal programs;
- falsely representing an affiliation with a homeowner's lender.

We have not determined whether your company is violating the law, but we urge you to review your practices to ensure that they comply. By sending you this notice, we do not waive the Commission's right to take action against you based on past or future law violations.

April 3, 2009

Page 2

The Commission has brought cases against companies and individuals, alleging they deceptively represented their mortgage rescue services. You can find them on the Commission's website at www.ftc.gov/bcp/edu/microsites/moneymatters/your-home-foreclosure-rescue-scams.shtml. You may find it helpful to review the following FTC publications as you take another look at your advertising:

- *Foreclosure Rescue Scams: Another Potential Stress for Homeowners in Distress*
<http://www.ftc.gov/bcp/edu/pubs/consumer/credit/cre42.shtm>
- *Dot Com Disclosures*
<http://www.ftc.gov/bcp/online/pubs/buspubs/dotcom/index.html>

Finally, your advertisement may be subject to laws enforced by other federal, state, or local law enforcement agencies.

Sincerely,

Peggy L. Twohig
Associate Director for Financial Practices