



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

Division of Marketing Practices  
Bureau of Consumer Protection

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**VIA FEDERAL EXPRESS**

Ann Marie Gaitan, Esq.  
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1110 Brickell Avenue, Suite 430  
Miami, Florida 33131

Dear Ms. Gaitan:

As you know, the Federal Trade Commission's Division of Marketing Practices staff conducted a non-public investigation into whether your client, La Asociacion Nacional de Trabajo ("L.A.N.D.T.")<sup>1</sup> violated Section 5 of the Federal Trade Commission Act, 15 U.S.C. § 45 *et seq.*, in connection with its online and print advertisements of a work-at-home opportunity marketed to Spanish speakers. Specifically, we were concerned that L.A.N.D.T. may have violated Section 5 by failing to substantiate the earnings claims made in its advertisements.

During our investigation, we learned that L.A.N.D.T. placed advertisements online at [www.trabajeahora.com](http://www.trabajeahora.com) and in Spanish-language newspapers in several cities throughout the United States, such as *El Tiempo Latino* in Washington, D.C.; *Hola Noticias* in Jacksonville, Florida; *La Voz de Austin* in Austin, Texas; and *Vida y Sabor* in Minneapolis-St. Paul, Minnesota. The company's advertisements claimed that consumers could earn from \$500 to \$1000 per week assembling products such as key chains and earrings from home. When consumers called the number advertised, L.A.N.D.T. told consumers that they could earn several hundred dollars per week. L.A.N.D.T., however, did not provide actual work-at-home opportunities, but merely provided a print directory that contained a list of companies that it claimed would pay individuals substantial amounts of money to work from home assembling various products.

Upon careful review of the matter, including non-public information submitted to the staff, we have determined not to recommend enforcement action at this time. Among the factors we considered were L.A.N.D.T.'s representations to the staff that the company has ceased all advertising and sales of its directory by shutting down its website, withdrawing all advertisements in Spanish-language newspapers, and suspending the use of the telephone line connected with the directory. The staff also has independently confirmed that L.A.N.D.T. has in fact taken these steps

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<sup>1</sup>L.A.N.D.T. also refers to the company's parents, subsidiaries, divisions, affiliates, branches, joint ventures, and agents.

Letter to Ms. Ann Marie Gaitan

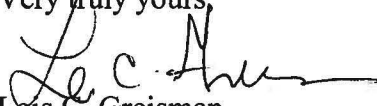
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to shut down its operation.

The staff encourages you to review guidance located on the Federal Trade Commission's Business Center available at <http://business.ftc.gov>. There, you can find useful information on how to comply with the Federal Trade Commission Act, including specific advice for small businesses. See <http://business.ftc.gov/documents/bus35-advertising-faqs-guide-small-business>.

The staff appreciates L.A.N.D.T.'s cooperation in resolving this matter expeditiously. This action is not to be construed as a determination that a violation of law did not occur, just as the pendency of an investigation should not be construed as a determination that a violation has occurred. The Commission reserves the right to take such further action as the public interest may require.

Very truly yours,



Lois C. Greisman