





6. One such video advertisement has been posted on the website YouTube.com. A video

- c. The video includes a similar advertisement for a 2008 Suzuki SX4, which also represents downpayment and monthly payment amounts. The advertisement does not clearly and conspicuously disclose the repayment terms and fails to disclose the annual percentage rate, or “APR,” using that term.

## **VIOLATIONS OF THE FEDERAL TRADE COMMISSION ACT**

### **Count I**

#### **Misrepresentation That Consumers Have Won a Prize**

7. Through the means described in Paragraph 4, respondent has represented expressly or by implication that consumers have won a prize worth between \$1,000 and \$25,000 that can be collected at the Fowlerville Ford dealership.
8. In truth and in fact, consumers have not won a prize worth between \$1,000 and \$25,000.
9. Respondent’s practices constitute deceptive acts or practices in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

#### **VIOLATION OF THE TRUTH IN LENDING ACT AND REGULATION Z**

10. Under Section 144 of the TILA and Section 226.24(d) of Regulation Z, as amended, advertisements promoting closed-end credit in consumer credit transactions are required to make certain disclosures (“additional terms”) if they state any of several terms, such as the m(cl)-6urur covb(r)5d .7rntsrrat-2(i)-2(o2)-t.001 Tw dvT-6(r)Tw 0 wt prv( d)2,wb1 terms,cn -21.4-6

13. Therefore, the practices set forth in Paragraph 12 of this Complaint have violated Section 144 of the TILA, 15 U.S.C. § 1664, and Section 226.24(d) of Regulation Z, 12 C.F.R. § 226.24(d), as amended.

THEREFORE, the Federal Trade Commission, this \_\_\_\_ day of \_\_\_\_\_, 2014, has issued this complaint against respondent.

By the Commission.

---

Donald S. Clark  
Secretary

SEAL: