

**ANALYSIS OF AGREEMENT CONTAINING  
CONSENT ORDER TO AID PUBLIC COMMENT**

*In the Matter of the Connecticut Chiropractic Association, the  
Connecticut Chiropractic Council, and Robert L. Hirtle, Esq., File No. 071 0074*

The Federal Trade Commission has accepted, subject to final approval, an agreement containing a consent order in the Connecticut Chiropractic Association (CCA), the Connecticut Chiropractic Council (CCC), and CCA's legal counsel, Robert L. Hirtle, Esq. The agreement relates to the Federal Trade Commission's CCA, CCC, and Mr. Hirtle in violation of Section 5 of the Federal Trade Commission Act, 15 U.S.C. 45, by changing



The ede d has identified a ea f the agree o a g CCA d CCC chf ac t b c u ASH, a d M. Htle ac i ie t c b age, facili ae, a d hel i le o the b c u, the th t b e o ASH f a agi g chf ac ic be efi r behalf f a a d thef e llee i C r ec ic t. Nei he CCA a CCC ha d take a g a ac i ie ha e ea e i teg a i a a g het e be i the deli e f chf ac ic e ice . Me be d t ha e a fr ac i al i k i b id i g chf ac ic e ice , d t c ll a e a a g a t i b a d dif cl i cal ac ice a e f het e be t c t l c t a d e be ali , b the i e i teg a e het deli e f ca e a i e t . B the ac e f th i the c l a i t , CCA, CCC, a d M. Htle ha e i la ed Sec i o 5 f the FTC Ac .

### The Proposed Consent Order

The ed d e i de i g e d b e ed the illegal c d c ch a g e d i the c l a i t a d b e e i b e c e . I i i l a t the c o t b d e th a the C i i a ha i e d e le ch a g e th a hea h ca e b id e o g a g e d i a l a f l e f a l t deal i h hea h l a . U n l i k e i i c o t b d e , h e e , h i b d e a l e le ch a g e th a a a b e a t i c i a e d i the a l a f l e f a l t deal i h the b id e .

The ed d e c e f i c b i i a e a f l l :

P a g a h I I A b h i n i C C A , C C C , a d M . H t l e f e t e i g i t b f a c i l i a i g a a g e e o b e e o b a a g a c h f a c i c : ( 1 ) r e g i a e i h a b a a c h f a c i c b e h a l f ; ( 2 ) d e a l , t t d e a l , b t h e a o t t d e a l i h a b ; ( 3 ) a h a t e t d e a l i h a a b .

O h e a t f P a g a h I I e i f c e h e e g e a l b h i n i . P a g a h I I B b h i n i the ed e d o f e a d i g i a a a c h f a c i c d e a l t d e a l i h a a b , a c c e t t a c c e t h e e c o d i r a h i c h the chf ac i i l l i g t d e a l i h a a b . P a g a h I I C f b i d the ed e d o f f a c i l i a i g e ch a g e f f f a i b e e o c h f a c i c c e e i g h e h e , a h a t e , t c o a c i h a a b . P a g a h I I D b h i n i b e d e d o f c o i g a e e i g f c h f a c i a f e a e a k e a t a e o b e g a d i g a c h f a c i i t e i t h a i f a g e e d t l d i l a e P a g a h I I A t h g h I I C a l e th a e i e j e c e d f the e e i g . P a g a h E b a t a t e t t o g a g e i a a c i b h i n e d b P a g a h I I A t h g h I I D , a d P a g a h F b e i b e i d c i g a e e t o g a g e i a a c i b h i n e d b P a g a h I I A t h g h I I E .

A i the C i i i b d e a d d e i g h e a h c a e b id e c o c e r e d a c i a g a i t h e a h c a e b c h a e , c o a i k i d f a g e e o a e e c l d e d f the g e a l b a j i t r e g i a i . M . H t l e l d t b e e c l d e d f o g a g i g i c o d c h a i b e a b l e e e a t f l e g i i a e j i t c o a c i g a a g e o a a g c e i g c h f a c i c , h e h e a a l i f i e d i k - h a i g j i t a a g e o t b a a l i f i e d c l i c a l l i t e g a e d j i t

arrange or, conduct that will be the best for the public interest (defined in Paragraph I.F).

A defined in the schedule, a qualified independent arrangement is a transaction that is not a financial transaction for the arrangement, but that is a financial transaction for the parties to the arrangement. Second, an arrangement is a qualified independent arrangement if it is a transaction that is not a financial transaction for the arrangement, but that is a financial transaction for the parties to the arrangement.

A qualified independent arrangement, in the hands of the parties to the arrangement, is a financial transaction. In addition, a defined in the schedule, a qualified independent arrangement is a financial transaction for the arrangement, but that is a financial transaction for the parties to the arrangement. A qualified independent arrangement, an arrangement is a qualified independent arrangement if it is a transaction that is not a financial transaction for the arrangement, but that is a financial transaction for the parties to the arrangement.

Paragraph III provides that the duties of CCA and CCC are to be carried out in the best interests of the United States and the public interest.

Paragraph IV provides that CCA and CCC are to be carried out in the best interests of the United States and the public interest.

Paragraph V.A provides that CCA and CCC are to be carried out in the best interests of the United States and the public interest. Paragraph V.B provides that CCA and CCC are to be carried out in the best interests of the United States and the public interest.

Paragraph V.C, V.D, VI, VII, and VIII provide that the duties of CCA and CCC are to be carried out in the best interests of the United States and the public interest.

Paragraph IX provides that the duties of CCA and CCC are to be carried out in the best interests of the United States and the public interest.