## Analysis of Proposed Consent Order to Aid Public Comment In the Matter of Courtesy Auto Group, Inc., Docket No. 9359

The Federal Trade Commission ("FTC") has accepted, subject to final approval, an agreement containing a consent order from Courtesy Auto Group, Inc. The proposed consent order has been placed on the public record for thirty (30) days for receipt of comments by interested persons. Comments received during this period will become part of the public record. After thirty (30) days, the FTC will again review the agreement and the comments received, and will decide whether it should withdraw from the agreement and take appropriate action or make final the agreement's proposed order.

Respondent is a motor vehicle dealer. According to the FTC Complaint, Respondent has advertised that consumers can pay \$0 up-front to lease a car for a specific monthly payment amount. The comp