

4. Respondent's acts of 2/17/12 and 2/18/12, as described in the attached exhibits, are
5. Respondent has placed *Angelo's Fish* advertisement copy on the website for advertisement that ran in the Los Angeles Times is attached as Exhibit A. The

FEDERAL TRADE COMMISSION ACT VIOLATIONS

Count I

Misrepresentation of Amount Due at Lease Inception

6. Through the means described in Paragraph 5, respondent has represented, expressly or by implication, that consumers can pay \$0 at lease inception to lease the advertised vehicles for the advertised monthly payment amounts.
7. In truth and in fact, consumers cannot pay \$0 at lease inception to lease the advertised vehicles for the advertised monthly payment amounts. Consumers must also pay at least \$1,995 at lease signing. Therefore, the representation set forth in Paragraph 6 was, and is, false or misleading.
8. Respondent's practices constitute deceptive acts or practices in or affecting commerce in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

VIOLATION OF THE CONSUMER LEASING ACT AND REGULATION M

9. Under Section 184 of the CLA and Section 213.7 of Regulation M, advertisements promoting consumer leases are required to make certain disclosures ("additional terms") if they state any of several terms, such as the amount of any payment ("CLA triggering terms"). 15 U.S.C. § 1667c; 12 C.F.R. § 213.7.
10. Respondent's advertisements promoting consumer leases, including but not necessarily limited to those described in Paragraph 5, are subject to the requirements of the CLA and Regulation M.

Count II

Failure to Disclose or to Disclose Clearly and Conspicuously Required Lease Information

11. Respondent's advertisements promoting consumer leases, including but not necessarily limited to those described in Paragraph 5, have included CLA triggering terms, but have failed to disclose or to disclose clearly and conspicuously additional terms required by the CLA and Regulation M, including one or more of the following:
 - a. That the transaction advertised is a lease.
 - b. The total amount due prior to or at consummation or by df aon ore019C12 Td total afC-2(e t)-2(3

- e. With respect to a lease in which the liability of the consumer at the end of the lease term is based on the anticipated residual value of the property, that an extra charge may be imposed at the end of the lease term.
12. Therefore, the practices set forth in Paragraph 11 of this Complaint have violated Section 184 of the CLA, 15 U.S.C. § 1667c, and Section 213.7 of Regulation M, 12 C.F.R. § 213.7.

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

By the Commission.

Donald S. Clark
Secretary