



UNITED STATES OF AMERICA
Federal Trade Commission
WASHINGTON, D.C. 20580

Office of the Secretary

June 18, 2014

Guisinger
State of Arizona

Re: In the ~~re~~

-4460

Thank you for your March 14, 2014 comment regarding the above-referenced matter. Your comment was placed on the public record pursuant to Section 2.34 of the Commission Rules of Practice, 16 C.F.R. § 2.34.

Your comment indicates your belief that the proposed consent order should include monetary relief in the form of disgorgement of ill-gotten gains related to sales of the ADT Pulse generated as a result of the misleading endorsements. The Commission has determined that the conduct relief obtained by the order is appropriate, as it will serve to deter future violations of the FTC Act by ADT. Moreover, as you correctly noted in your comment, if ADT violates the Commission's final order, it will be liable for civil penalties of up to \$16,000 for each separate violation, pursuant to Section 5(l) of the FTC Act, 15 U.S.C. § 45(l).

After considering your comment, along with others received in this matter, the Commission has determined that the public interest would best be served by issuing the Decision and Order in final form without modification. A copy of the final Decision and Order, and other relevant materials are available from the Commission's website at <http://www.ftc.gov>.

Thank you again for your comment. The Commission is aided in its analysis by hearing from a variety of sources, and we appreciate your interest in this matter.

By direction of the Commission, Commissioner McSweeney not participating.

Donald S. Clark
Secretary