



UNITED STATES OF AMERICA  
FEDERAL TRADE COMMISSION  
WASHINGTON, D.C. 20580

Office of the Secretary

June 2, 2015

Step Up Savannah  
State of Georgia

Re: *In the Matter of First American Title Lending of Georgia, LLC.*

*FTC File No. 1323264* *501mePub/FTC/2015/06/02/1323264*  
complaint and consent agreement should help address some of your  
loan advertising. Specifically, the proposed complaint alleges that First  
deceptively advertised car title loans at 10% interest rate without adequate  
0% offer was subject to significant qualifications. Additionally, the prop  
that First American Title Lending failed to provide an "annual per  
alongside the advertised rate, violation of the Truth in Lending Act ("TILA")  
consent agreement requires First American Title Lending to clearly and  
all qualifying terms associated with obtaining the loan at its advertised  
APR alongside that rate.

After consideration of your comment, the Commission has determined that the relief set forth in the consent agreement is appropriate and sufficient to remedy the violations alleged in the Complaint. Accordingly, the Commission has determined that the public interest would best be served by issuing the Decision and Order in this matter in final form without modification. The final Decision and Order and other relevant materials are available from the Commission's website at <http://www.ftc.gov>. It helps the Commission's analysis to hear from a variety of sources in its work, and we thank you again for your comment.

By direction of the Commission.

Donald S. Clark  
Secretary