

United States of America FEDERAL TRADE COMMISSION Washington, D.C. 20580

Division of Advertising Practices

April 2, 2020

Via Electronic Mail (lbrett@bbbnp.org)
Laura Brett, Esq.
Vice President
National Advertising Division
112 Madison Avenue, 3rd Floor
New York, NY 10016

Re: Advertising by ConsumerTrack, Inc. for GoFreeCredit.com

Dear Ms. Brett:

We have reviewed the National Advertising Division's referral of One Technologies, LLC's Challenge regarding advertising by ConsumerTrack, Inc. ("ConsumerTrack") for its GoFreeCredit.com product. In your February 25, 2020 referral letter, you advised us that ConsumerTrack declined to participate in the NAD process. Accordingly, you referred this matter to the Federal Trade Commission for our review.

Upon careful review of this referral, we have determined not to take additional action at this time. In reaching this conclusion, we considered a number of factors including resource allocation and enforcement priorities, the nature of any FTC Act violation, and the type and severity of any consumer injury.

The staff's decision to forego a formal investigation at this time is not to be construed as a determination that a violation may not have occurred, just as the pendency of an investigation should not be construed as a determination that a violation has occurred. The Commission reserves the right to take such further action as the public interest may require. The FTC appreciates your referral and the opportunity to continue to assist in supporting the NAD.

Very truly yours,

Carolyn L. Hann

Chief of Staff for Advertising Practices