



Office of the Secretary

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

April 11, 2014

Keith Orsini
State of North Carolina

Re: *In the Matter of Paramount Kia of Hickory, LLC*
FTC File No. 132 3191, Docket No. C-4450

Thank you for commenting on the Federal Trade Commission's proposed consent agreement in the above-referenced proceeding. The Commission has placed your comment on the public record pursuant to Rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii), and has given it serious consideration.

As we understand your comment, you support the FTC's enforcement action and suggest that there be penalties assessed for the violations alleged in the FTC's Complaint. Under the law, civil monetary penalties may not be assessed for violating Section 5(a) of the FTC Act or the provisions of the Truth in Lending Act at issue here. However, the proposed order prohibits Paramount from engaging in the conduct that was the subject of the action, and should Paramount violate the order, it would be subject to a civil monetary penalty of up to \$16,000 per violation.

After due consideration, 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