



Office of the Secretary

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

July 18, 2013

Christopher Morgan  
State of Florida

Re: *In the Matter of The Neiman Marcus Group, Inc., File No. 082 3199, Docket No. C-4407*  
*In the Matter of DrJays.com, Inc., File No. 122 3063, Docket No. C-4408*  
*In the Matter of Eminent, d/b/a Revolve Clothing, File No. 122 3065, Docket No. C-4409*

Dear Mr. Morgan:

Thank you for commenting on the Federal Trade Commission's proposed consent agreements in the above-referenced proceedings. 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.

Your comment raised concern that the agreements' injunctive relief is insufficient and argued that they should not terminate after 20 years. After consideration of your comment, the Commission has determined that the relief set forth in the consent agreements is appropriate and sufficient to remedy the violations alleged in the complaints. The orders prohibit the respondents from web, mail, and catalog advertisements that violate the Fur Act and Rules. Under federal law, a violation of an FTC order is punishable by a civil penalty of up to \$16,000 per violation. Therefore, if the respondents' websites falsely advertise fur products as "faux" in the future, the respondents may be liable for significant civil penalties. Moreover, respondents have offered refunds to all consumers who purchased the falsely advertised products. Finally, the 20 year sunset provision merely reflects longstanding Commission policy for administrative orders.

Accordingly, the Commission has determined that the public interest would best be served by issuing the Decision and Order in each of these matters in final form without modification. The final Decisions and Orders 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