



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

Division of Privacy and Identity Protection

June 16, 2011

M. Howard Morse
Cooley LLP
777 Sixth St. N.W., Suite 1100
Washington, DC 20001

Re: TruEffect, Inc., FTC File No. 102-3190

Dear Mr. Morse:

As you know, the staff of the Federal Trade Commission's Division of Privacy and Identity Protection has conducted an inquiry into whether TruEffect, Inc.'s practices may violate Section 5 of the Federal Trade Commission Act, 15 U.S.C. § 45. Upon careful review of the matter, we have determined not to recommend enforcement action at this time. This action 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.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Maneesha Mithal".

Maneesha Mithal
Associate Director
Division of Privacy and Identity Protection