



Office of the Secretary

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

April 11, 2014

Parekh  
State of California

Re: *In the Matter of Bill Robertson & Sons, Inc., d/b/a Honda of Hollywood*  
*FTC File No. 132 3142*

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 would like to know why Bill Robertson & Sons, Inc. d/b/a Honda of Hollywood (Honda of Hollywood) is not being fined and why it has not admitted guilt as part of the consent agreement in this action. Under the law, a civil monetary penalty (*i.e.* fine) may not be assessed for violating Section 5(a) of the FTC Act or the provisions of the Consumer Leasing Act at issue here. However, the proposed order prohibits Honda of Hollywood from engaging in the conduct that was the subject of the action, and should the company violate the order, it would be subject to a civil monetary penalty of up to \$16,000 per violation. Honda of Hollywood's statement in the preamble to the proposed order that it neither admits nor denies the allegations in the complaint does not affect enforceability of the order.

We appreciate your comment, and 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