



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

Division of Advertising Practices

March 11, 2014

**Via Email and Overnight Courier**

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Re: Pitch Public Relations, LLC, File No. 122 3134

Dear Ms. Limón-Wynn:

As you are aware, staff of the Federal Trade Commission's Division of Advertising Practices has conducted an investigation into the role of Pitch Public Relations, LLC ("PPR") in arranging for Alison Rhodes-Jacobson to conduct media interviews on national television programs to promote the ADT Pulse home security system. Our inquiry focused on whether adequate disclosure was made in those media interviews that Ms. Rhodes-Jacobson was compensated to endorse the ADT Pulse.

The Federal Trade Commission recently entered into a consent agreement with ADT LLC, the manufacturer of the ADT Pulse, settling charges that ADT misrepresented that paid endorsements from safety and technology experts, including Ms. Rhodes-Jacobson, were independent and impartial reviews and failed to disclose that the experts were being paid by ADT to promote the Pulse system. A copy of the press release announcing that settlement is attached.

To avoid deception under Section 5 of the FTC Act, a material connection between an advertiser and an endorser, such as a financial relationship or compensation, should be clearly and conspicuously disclosed in the communication that contains the endorsement when that relationship is not otherwise apparent from the context. Any party that actively participates in the marketing of products through paid endorsers, including a public relations firm such as PPR, has a responsibility to make sure that those disclosures are made. We encourage PPR to review its current practices to determine whether there are additional measures the company can take to ensure that paid endorsers make appropriate disclosures when reviewing products in the media.

Staff appreciates PPR's cooperation in this investigation. Upon careful review of this matter, and taking into consideration PPR's limited role in the media campaign for the ADT

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Pulse, we have decided to close our investigation of PPR. Our decision to close this investigation without pursuing enforcement 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 warrant.

Very truly yours,

A handwritten signature in black ink that reads "Mary K. Engle". The signature is written in a cursive style with a large, looping "E" at the end.

Mary K. Engle  
Associate Director

Attachment