



Office of the Secretary

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

September 3, 2008

**VIA UNITED STATES MAIL**

Brinett Mortiss

[Address]

Texas

**Re: *In the Matter of We Give Loans, Inc.*, FTC File No. 072-3205**

Dear Ms. Mortiss:

Thank you for the comment you submitted regarding the above-referenced matter. Your comment was placed on the public record pursuant to Section 2.34 of the Commission's Rules of Practice, 16 C.F.R. § 2.34, and was given serious consideration by the Commission.

In your comment, you suggest that the proposed consent order may not provide a sufficient deterrent primarily because it does not seek civil penalties. Civil penalties, however, generally are not available for violations of the Truth in Lending Act ("TILA"), 15 U.S.C. §1664, and its implementing Regulation Z, 12 C.F.R. §226.24(c). Furthermore, respondent will not only be required to comply with the Order's injunctive provisions, but will be subject to civil penalties if it violates the Order in the future. *See* Section 5(l) of the FTC Act, 15 U.S.C. §45(l). The Commission believes this will serve as a strong deterrent to any future noncompliance with TILA and Regulation Z and is an appropriate result here.

After considering all of the factors that must be weighed in evaluating any settlement, the Commission concluded that the strong injunctive provisions in the proposed consent order provide an appropriate resolution of this case. Thus, after considering your comments, the Commission has determined that the public interest would best be served by issuing the Decision and Order in final form without substantive modification.

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Thank you again for your comment. The Commission is aided in its analysis by hearing from a variety of sources in its work, and it appreciates your interest in this matter.

By direction of the Commission.

Donald S. Clark  
Secretary