



Feb. 8, 2011

The Hon. Jon Leibowitz
Chairman
Federal Trade Commission
600 Pennsylvania Ave.
Washington, DC
20580

Re: Deceptive mortgage modification advertising on Google

Dear Chairman Leibowitz,

I am writing to ask the Federal Trade Commission to investigate Google Inc.'s ongoing role as a facilitator of deceptive advertising in the so-called mortgage modification industry. We commend the FTC's Operation Stolen Hope, which has sued more than 25 foreclosure rescue marketers. However, as our study, "Liars and Loans: How Deceptive Advertisers Use Google," found, even as one fraudster is shut down by the FTC, others using the same deceptive techniques continue to offer their fraudulent promises of false hope in advertisements on Google's search engine.

Google, the study found, typically rejects advertising with dubious promises of mortgage help only after regulatory authorities have taken action against the fraudster. This is already too late for many consumers.

Google's willingness to accept such obviously deceptive advertising is the problem. The company must take a proactive role in preventing deceptive ads that prey on vulnerable consumers.

Because Google so far has turned a blind eye to these fraudsters, perhaps because of the substantial revenue such advertising can generate, we ask that the FTC investigate Google's role as a facilitator of deceptive and fraudulent advertising and act to prevent the Internet giant from continuing its harmful behavior.

Although Consumer Watchdog has not documented the practices of other search

engines in regards to mortgage modification ads, Google is unlikely to be the only offender. The FTC investigation should also determine if other companies facilitate similar deceptive advertising.

I am enclosing our study, "Liars and Loans: How Deceptive Advertisers Use Google." Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "John M. Simpson". The signature is fluid and cursive, with a long horizontal stroke at the end.

John M. Simpson
Consumer advocate

Cc: Commissioner Julie Brill; Commissioner William E. Kovacic, Commissioner J. Thomas Rosch; Commissioner Edith Ramirez; David Vladeck, Director Bureau of Consumer Protection