



Office of the Secretary

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

June 3, 2008

VIA UNITED STATES MAIL

Brantford Moorish  
State of Texas

Re: *In the Matter of CashPro d/b/a MakePaydayToday.com*  
*File No. 072-3203, Docket No. C-4220*  
*In the Matter of American Cash Market, Inc.*  
*File No. 072-3210, Docket No. C-4221*  
*In the Matter of Anderson Payday Loans*  
*File No. 072-3212, Docket No. C-4222*

Dear Mr. Moorish:

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

In your comments, you suggest that the proposed consent orders are potentially insufficient because they do 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, respondents will not only be required to comply with the Order's injunctive provisions, but will be subject to civil penalties if they violate the Order. 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 orders provide an appropriate resolution of these cases. Thus, after considering your comments, the

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Commission has determined that the public interest would best be served by issuing the Decision and Order in final form without substantive modification.

Thank you again for your comments. 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