



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

Division of Advertising Practices

November 19, 2008

Mr. Kenneth Garcia  
Halo Technologies, Inc.  
13310 S Ridge Dr.  
Suite C  
Charlotte, NC 28273

Re: *Halo Technologies, Inc.*, File No. 082-3202

Dear Mr. Garcia:

As you know, upon referral from the National Advertising Division of the Council of Better Business Bureaus, the staff of the Federal Trade Commission's Division of Advertising Practices has conducted an investigation into whether your company, Halo Technologies, Inc. ("Halo"), violated Section 5 of the Federal Trade Commission Act, 15 U.S.C. § 45, through the use of false and misleading advertising in connection with the sale of its ultraviolet vacuum cleaners. Specifically, FTC staff was concerned about Halo's express and implied health-related performance claims that its ultraviolet vacuums kill dust mites, fleas, bacteria, viruses, and mold, thereby protecting users from indoor allergies, asthma, and the flu by disinfecting carpets and flooring.

Upon review of this matter, we have determined not to recommend enforcement action at this time. Among the factors that we considered are that Halo is no longer advertising, marketing, or distributing any ultraviolet vacuum cleaners and the company is in the process of dissolution. This decision 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 require.

Very truly yours,

A handwritten signature in black ink that reads "Mary K. Engle".

Mary Koebel Engle  
Associate Director

cc: Andrea C. Levine, NAD