

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

Division of Financial Practices Bureau of Consumer Protection

> Jessica Rich Associate Director

Telephone (202) 326-2148

December 18, 2012

BY EMAIL

Claude Wild Greenber Traurig, LLP 1200 17th Street, Suite 2400 Denver, CO 80202

Re: Island Finance, LLC/Alliance Funding, LLC (FTC File No. 1223070)

Dear Mr. Wild:

As you know, the staff of the Federal Trade Commission's Division of Financial Practices has been conducting a non-public investigation of Island Finance, LLC, a payday lender affiliated with the Fort Belknap Indian Community, and Alliance Funding, LLC, a payday lending servicer, for possible violations of Section 5 of the Federal Trade Commission Act ("FTC Act"), 15 U.S.C. § 41 et seq. and the Truth in Lending Act, 15 U.S.C. §§ 1601-1666j. Based on the information that the Commission staff reviewed in its investigation, Commission staff has determined to close this investigation.

Upon careful review of the matter, including information submitted to FTC staff, we have determined not to recommend enforcement action at this time. The decision not to recommend enforcement action is based on findings specific to this particular investigation.

The closing of this investigation is not to be construed as a determination that a violation of law did not occur, 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.

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Jessica Rich

Associate Director

Division of Financial Practices