



September 24, 2010

Mr. Willard K. Tom
General Counsel
Federal Trade Commission
600 Pennsylvania Ave., NW
Washington, DC 20580

Ms. Deanya T. Kueckelhan
Southwest Region
Federal Trade Commission
1999 Bryan Street, Suite 2150
Dallas, TX 75201-6808

Re: Timeshare Resale Scams Targeting Older Adults

Dear Ms. Kueckelhan & Mr. Tom:

I write to you on behalf of AARP to thank you for your enforcement efforts in Florida, along with the Florida Attorney General and other state agencies, in combating fraud within the timeshare resale industry. I also ask you to consider working with the Attorneys General in California and Illinois to commence a broader nationwide investigation of timeshare firms who target the elderly on a nationwide basis. While most timeshare firms solicit customers nationwide, state Attorneys General can only bring injunctions that affect their own residents; a nationwide effort by the FTC would greatly help protect older people targeted by these scams.

AARP is a nonpartisan, nonprofit organization of people aged 50 or older. As the largest organization in the United States dedicated to addressing the needs and interests of older Americans, AARP is greatly concerned about ensuring strong protections against unfair and deceptive practices in the marketplace that target vulnerable populations, such as older individuals who are disproportionately victimized by many of these practices.

As you know, in these tough economic times thousands of older people have become victims of widespread timeshare resale scams. See e.g., Sid Kircheimer, *Time-share Trickery*, AARP Bulletin (June 1, 2010), <http://www.aarp.org/money/scams-fraud/info-06-2010/scam_alert_time_share_trickery.html>; Nirvi Shah, *More Florida Timeshare Resellers Sued, Subpoened*, Miami Herald, <<http://www.miamiherald.com/2010/07/20/1738868/more-florida-timeshare-resellers.html>>. The Attorneys General in Massachusetts and Florida have identified time-share reselling scams as their top consumer complaint. In fact, there are currently three separate state actions against one such firm, *Stroman Realty, Inc.*, a Texas corporation.

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For more specific information regarding the pending court cases against *Stroman Realty, Inc.*, your office should call the Deputy Attorneys General in charge of the cases, specifically:

Steven J. Green, California AG	(916) 324-5157
Jim Peters, Florida AG	(850) 414-3808
Joan Matlack, Illinois AG	(312) 793-2394

Thank you in advance for your attention to this matter.

Sincerely,



David Certner
Legislative Counsel and Legislative Policy Director
Government Relations and Advocacy