



Comment Info: =====

General Comment: The Consent Order seems to be largely a paper tiger. Hasn't the damage already been done, as the result of the repeal of Law 278? It's like saying, we'll will forgive you for the murder you committed provided that you don't do it again. Who wouldn't agree to that?

Furthermore, the exception to the Consent Order permits a repetition of the same conduct. Given the upshot of the instant proceeding, American Petroleum can't be very scared of litigating with the FTC over whether they violated the Consent Order. That's especially the case given the recent Supreme Court decision supporting corporate speech in election campaigns. The Consent Order sounds like a great deal for American Petroleum, and a lousy deal for the public.

Richard Pu, Richard Pu, P.C.