

Compliance Review of Store's Online Advertising

<https://www.easy2getfurniture.com/>

Please see attached screenshots for reference

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For 1-5, please refer to https://www.easy2getfurniture.com/Frequently-Asked-Questions_ep_62-1.html

1) "no interest pay off option" found under the question "What Are My Payment Options?"

There's no interest charged on a lease-purchase option; however, there's a cost of leasing.

2) "We are required by law to charge sales tax for all interstate sales we make" under the "Sales Tax" section:

For purchases made through Progressive Leasing, the store isn't to charge sales tax.

3) "90 Day Payment Option*" found on the Progressive Leasing advertisement in the sidebar:

We don't offer a 90-day Payment Option in CA.

4) "Financing" link found at the bottom of the page:

We aren't a financing option.

5) "Financing & Leasing" link at the top of the page:

We aren't a financing option.

For 6-16, please refer to <https://www.easy2getfurniture.com/Progressive/progressive.html>

Please keep in mind that the store is also able to replace the FAQ section on this page with a link to our FAQ page: <https://progleasing.com/frequently-asked-questions/>

6) "90 Day Payment Option*" near the top of the page:

We don't offer a 90-day Payment Option in CA.

7) "Our approval is based on income and employment" found under the section labeled "No Credit Needed":

Our approvals are based on several factors, and this process is proprietary to our application process. We can't imply that any approval/approval limit is guaranteed.

8) "90-Day Payment option, discounted early buyout 90 days:" under "Simple Payment Plans":

We don't offer a 90-day Payment Option in CA, and we have an Early Buyout Option after the 90-day Payment Option (3 Months in CA), not a discounted version of the 90-day option.

9) "Payments can be automatically withdrawn from your account:" found under "Simple Payment Plans:

This implies that the customer gets to choose before payments begin.

10) "See our Pre-Approval Matrix to get a free peek at what your payments may look like" under "Simple Payment Plans":

We can't imply that any approval/approval limit is guaranteed.

11) "Once the item(s) has been paid in full, you own the product(s)." under the question "What is the Progressive Lease-to-Own program?":

This can misleading since there's usually a cost of leasing included in the lease balance.

12) Answer to the question "What do I need to apply?":

This contains unapproved requirements that the retailer isn't allowed to list.

13) "after the lease is executed" in answer to the question "Is there a processing fee for the Progressive Leasing lease?":

This isn't clear. We don't require the initial payment when the contracts are created. We require it only when it is e-signed.

14) "and closed Sunday" in answer to the question "How long is the lease agreement?":

Our customer service department is open on Sundays; however, this isn't a fact we proactively advertise.

15) The answer to the question "How long is the lease agreement?":

This store does not offer any other lease term beside 12 months.

16) "Leasing available at select Big Lots locations only" at the bottom of page:

This page isn't for a Big Lots location.

For 17, please see <http://www.easy2getfurniture.com/>

17) "90 day Payment Option" banner:

We don't offer a 90-day Payment Option in CA.

For 18-19, please see http://www.easy2getfurniture.com/Grey-with-Mirrored-Accents-Strips-Chest-p_5265.html as an example

18) "Enjoy your furniture today and pay it later" found under the button to apply for Progressive Leasing:

We require minimum payments. We aren't a "Buy Now Pay Later" type of company, and it can't be implied that we are.

19) "No interest for 90 days" found under the button to apply for Progressive Leasing:

We don't have interest, and it can't be implied that we do.

For 20, please see https://www.easy2getfurniture.com/checkout_one.asp (or any checkout page for any item)

20) "Get Approved" when Progressive Leasing is selected under the third step, "Choose one payment method":

It can't be implied that any approval/approval limit is guaranteed.

For 21, please see https://www.yelp.com/biz_photos/e2get-furniture-los-angeles-2?select=nTEsu9n4r-qbdbGKFw06TA

21) "Online instant approval" image description:

Progressive Leasing is the only purchase option available on the store's website to apply online. It can't be implied that we are a financing company or that approvals/approval limits are guaranteed.

For 22, please see https://www.yelp.com/biz_photos/ez2get-furniture-los-angeles-2?select=dwF3PioORFamG1spW_eaEg

22) "90 Day Payment Option" on online image:

We don't offer a 90-day Payment Option in CA.

For 23, please see <https://www.instagram.com/p/Bo-UgrYBQGa/>

23) "90 Day Payment Option", "Financing", "#ezfinancing", "#90daynotinterest", and "\$49down" on Instagram post:

We don't offer a 90-day Payment option in CA. The description of this image calls us financing, implies we have interest and a down payment. When a specific initial payment amount is used, the initial payment disclosure is required.

For 24, please see <https://www.easy2getfurniture.com/Progressive/progressive.html>

24) "Progressive Financing" title of Easy 2 Get Leasing page:

We aren't a financing company, and this isn't our name.

To Resolve:

1) Please shorten this description to simply "Offered by Progressive Leasing".

2) Please add a clarification such as "If making a lease purchase through Progressive Leasing, please be aware that they will handle charging the tax rate on your purchase." or similar.

3) If the store serves residents outside of CA, please change to "90-day Payment Option (3 Months in CA)". Please change to "3 Months Same-As-Cash".

4-5) Please change to "Progressive Leasing" since it is a page dedicated to solely our company.

6) Please change to "90-day Payment Option (3 Months in CA)".

7) Please shorten to "There's no credit needed when you use Progressive Leasing!"

8) Please change this sub-header to "90-day Payment Option (3 Months in CA) and Early Buyout Option:"

9) Please change to "Payments will be set up to automatically withdraw from your checking account by default:" or similar.

10) Please remove or replace with a relevant statement such as "If you'd like to make any changes to the way your payments are withdrawn, you are welcome to contact Progressive Leasing at 877-898-1970 or customersupport@progleasing.com".

11) Please change to "Make all the regularly scheduled payments outlined in your lease agreement or utilize an early purchase option to own your merchandise."

12) Please replace with the 4 approved application requirements:

Must be 18 years or older

Must have valid Social Security Number or ITIN

Have routing and account numbers for an open and valid checking account

Have a Credit or debit card

13) Please change to "when the lease is signed".

14) Please remove "and closed Sunday".

15) Please change to "Most lease agreements are for a maximum term of 12 months; however, you are welcome to contact Progressive Leasing and ask to take advantage of your 90-day Payment Option (3 Months in CA) or Early Buyout Option."

16) It is recommended that this statement be removed or changed to fit the store, EZ 2 Get Furniture.

17) Please change to "90-day Payment Option (3 Months in CA)".

18) Please shorten to "Enjoy your furniture today".

19) Please change to "Apply for Progressive Leasing here!" or similar.

20) Please change to "Get an Instant Decision".

21) Please remove "Online instant approval", so nothing in the post references Progressive Leasing.

22) Please remove image or change the image description to clarify "90-day Payment Option (3 Months in CA)".

23) Please remove this post.

24) Please update the title of the page to "Progressive Leasing".

Progressive

- Financing
- 3 months same as cash
- cost to lease / can't say no interest

21) 22) instant decision

23) Instagram

24) Progressive Leasing