

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

Bureau of Consumer Protection Division of Enforcement

> Julia Solomon Ensor Attorney

Email: jensor@ftc.gov Direct Dial: (202) 326-2377

January 9, 2018

## VIA FEDEX

Brian Siegel, Esq.
Secretary, Treasurer, & General Counsel
The Solid Wood Cabinet Company, LLC, d/b/a Solid Wood Cabinets
928 Jaymor Road, Suite A-100
Southampton, PA 18966

Dear Mr. Siegel:

We received your submissions on behalf of The Solid Wood Cabinet Company, LLC, d/b/a Solid Wood Cabinets ("Solid Wood Cabinets" or the "Company"). During our review, we discussed concerns that certain marketing materials may have overstated the extent to which Solid Wood Cabinets' products are made in the United States. Specifically, although the Company assembles cabinetry in its factory, much of the base material for its products comes from overseas. Additionally, Solid Wood Cabinets sells a line of wholly imported, ready-to-assemble products.

As discussed, unqualified "Made in USA" or "Built in USA" claims on company marketing materials likely suggest to customers that all the products advertised in those materials are "all or virtually all" made in the United States. Accordingly, to avoid deceiving consumers, you explained that the Company updated its website, social media accounts, and other marketing materials to remove, or, where appropriate, qualify U.S.-origin claims.

Based on your actions and other factors, the staff has decided not to pursue this investigation any further. This action should not be construed as a determination that there was no violation of Section 5 of the Federal Trade Commission Act, 15 U.S.C. § 45. The Commission reserves the right to take such further action as the public interest may require. If you have any questions, you can reach me at (202) 326-2377.

Sincerely,

Julia Solomon Ensor

Staff Attorney