



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

Bureau of Consumer Protection
Division of Enforcement

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FEDERAL EXPRESS

Frank J. Brixius Jr., Esq.
Associate General Counsel
Graco Inc.
88 - 11th Avenue N.E.
Minneapolis, MN 55413
cbrixius@graco.com

Dear Mr. Brixius:

We received your submissions of January 9, 10, 16, and 31, 2014, on behalf of Graco Inc. ("Graco"), explaining, among other things, that Graco inadvertently applied "Made in USA" labels to a part now sourced overseas. This problem was caused by a failure to update a product database to reflect a change in manufacturing facilities.

In your submissions, you stated that Graco acted quickly to implement a remedial action plan to correct its representations and avoid future mislabeling. This plan included: (1) updating the product database; (2) correcting labels on affected products still in inventory; and (3) training staff to update the product database and review labels more frequently. In addition to addressing this incident, Graco committed to carefully reviewing and updating qualified "Made in USA" claims on its marketing materials to prevent possible consumer confusion about the country-of-origin of other products.

Based on your statements, 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,

A handwritten signature in black ink, appearing to read "J. Ensor".

Julia Solomon Ensor
Staff Attorney