



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

Bureau of Consumer Protection  
Division of Enforcement

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October 20, 2015

**FEDERAL EXPRESS**

Annemarie C. O'Shea, Esq.  
Associate General Counsel  
Walmart Global eCommerce  
Wal-Mart Stores, Inc.  
850 Cherry Avenue  
San Bruno, CA 94066

Dear Ms. O'Shea:

We received your submissions on behalf of Wal-Mart Stores, Inc. ("Walmart"). During our review, we discussed concerns relating to discrepancies or outdated information regarding country-of-origin claims on the walmart.com website. We also discussed concerns regarding the clarity and conspicuousness of disclosures on "Made in USA" logos used in conjunction with Walmart's Investing in American Jobs Program.

In response to our inquiry, Walmart took several steps to prevent consumer deception. With regard to its website, Walmart: (1) removed "Made in USA" logos from all product listings; (2) removed country-of-origin information from all product specifications, except where required by law; (3) removed U.S.-origin claims that appeared in product descriptions or titles; and (4) implemented a procedure to flag and remove new U.S.-origin claims made in ad copy submitted by suppliers.

Additionally, Walmart rolled out redesigned "Made in USA" logos for private brand products promoted in conjunction with the Investing in American Jobs Program. The redesigned logos, which appear on product packaging, include larger disclosures regarding the percentage of U.S. content contained in the product, as well as a disclosure intended to convey that the U.S.-origin claim is self-certified by the supplying factory.

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,

A handwritten signature in blue ink, appearing to read "J. ENSOR". The signature is stylized with loops and a long horizontal stroke at the end.

Julia Solomon Ensor  
Staff Attorney