



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

Bureau of Consumer Protection
Division of Enforcement

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FEDERAL EXPRESS

Mr. Richard Massey
Regulatory Affairs
SnugZ USA
5200 Highland Dr., Ste. 301
Salt Lake City, UT 84117

Dear Mr. Massey:

We received your submissions on behalf of SnugZ USA ("SnugZ" or the "Company"). During our review, we raised concerns that certain marketing materials may have overstated the extent to which SnugZ's products are made in the United States. Specifically, although the Company sells certain promotional products that are made in the United States, it also sells a line of lanyards that includes significant imported content.

As discussed, unqualified "Made in the USA" claims on marketing materials likely suggest to consumers that all products advertised in those materials are "all or virtually all" made in the United States. Accordingly, to avoid deceiving consumers, you explained that SnugZ implemented a remedial action plan to clarify its representations. This plan included: (1) performing a company-wide analysis of all labeling, catalogue, website, and social media claims; (2) updating claims as necessary by removing "Made in the USA" and replacing it with "Assembled and Printed in the USA"; and (3) sending an email to the Company's sales teams, marketing team, industry bloggers, and re-sellers with updated marketing materials.

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".

Julia Solomon Ensor
Staff Attorney