



UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
600 PENNSYLVANIA AVENUE, NW
WASHINGTON, DC 20580

Division of Enforcement
Bureau of Consumer Protection

January 20, 2012

By Email and U.S. Mail

Andrew C. Finch
Paul, Weiss, Rifkind, Wharton & Garrison LLP
1285 Avenue of the Americas
New York, NY 10019-6064

Re: Lucky Brand Dungarees, Inc.

Dear Mr. Finch:

Federal Trade Commission staff has received a September 2, 2011, letter from your firm on behalf of Lucky Brand Dungarees, Inc., ("Lucky") responding to our inquiry about advertising describing Lucky's clothing as "hand crafted in America," made in the United States, and/or "born in America." The letter reported that Lucky had removed "hand crafted in America" from its website, and that the phrase does not appear in any other Lucky advertising. In addition, the letter identified fourteen products that Lucky's website inaccurately advertised as made in the United States, and stated that Lucky had since corrected these incorrect statements. Finally, after submitting the letter, Mr. David Schwartz-Leeper of your firm informed us that Lucky has removed "Born in America" from its website, advertising, and promotional materials.

Based on this information, we have decided not to pursue this inquiry 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, I can be reached at (202) 326-2976.

Sincerely,

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

Matthew J. Wilshire
Staff Attorney