



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

Bureau of Consumer Protection
Division of Enforcement

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October 3, 2016

FEDERAL EXPRESS

Jeffrey A. Bullock, President
Ballistic Fabrication LLC
2010 W. McMillan St.
Tucson, AZ 85705-2214

Dear Mr. Bullock:

We received your submissions on behalf of Ballistic Fabrication LLC ("Ballistic"). During our review, we raised concerns that Ballistic's marketing materials may have overstated the extent to which certain products are made in the United States, including joints and bushings that incorporate imported metal housings.

As discussed, unqualified "Made in USA" claims likely suggest to consumers that the products advertised are "all or virtually all" made in the United States. Accordingly, to avoid deceiving consumers, you explained that Ballistic implemented a remedial action plan to clarify its representations. This plan included: (1) removing outdated catalogues and other materials from the Ballistic website; (2) removing unqualified "Proudly Made in the USA" claims from the homepage; and (3) introducing qualified claims for affected products that clearly disclose that those products contain a mix of domestic and imported 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