Division of Enforcement
Bu reau of Consumer Protection

FEDERAL EXPRESS

Mr. Gerardo Anaya
President
G&A Investments, Inc.
2615 Fruitland Avenue
Vernon, California 90058

Dear Mr. Anaya:

UNITED STATES OF AMERICA

FEDERAL TRADE COMMISSION 600 PENNSYL VANIA AVENUE, NW
WASHINGTON, DC 20580

September 6, 2012

The staff of the Federal Trade Commission has received your submissions of July 9, 2012
and July 31, 2012 on behalf of G&A Investments, Inc. ("G&A"). In our correspondence and discussions, you indicated that some of G&A's gun cleaning patches are made with imported material and therefore have more than de minimis foreign content. You also stated, however, that G&A based its unqualified "Made in USA" claims for these products upon the fact that G&A converts these materials into gun patches in its U.S. manufacturing plant. In light of guidance provided by Commission staff, however, you now indicate that G&A no longer makes unqualified "Made in USA" claims for products that are not all or virtually all made in the United States.