Division of Enforcement
Bureau of Consumer Protection

FEDERAL EXPRESS

Mr. Michael A. Lindsay
Dorsey & Whitney, LLP

UNITED STATES OF AMERICA

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

September 6, 2012

50 South Sixth Street, Suite 1500
Minneapolis, Minnesota 55402

Dear Mr. Lindsay:

The staff ofthe Federal Trade Commission has received your submissions of July 30,
2012 and August 14,2012 on behalf of Gilmour Manufacturing Company, Inc. ("Gilmour"). In our correspondence and discussions, you indicated that some of Gilmour brand nozzles may have been inadvertently advertised as "Made in USA" despite being made in China. You explained that Gilmour transferred production of its nozzles from the United States to Asia. Although product packaging correctly reflected this fact,

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