

UNITED STATES OF AMERICA  
BEFORE THE FEDERAL TRADE COMMISSION

In the Matter of	)	
	)	
BOLLMAN HAT COMPANY, a company,	)	FILE NO. 172 3197
and	)	
	)	AGREEMENT CONTAINING
SAVEANAMERICANJOB, LLC, a limited	)	CONSENT ORDER
liability company,	)	
	)	
jointly d/b/a AMERICAN MADE MATTERS.	)	
	)	

The Federal Trade Commission (“Commission”) has conducted an investigation of certain acts and practices of Bollman Hat Company and SaveAnAmericanJob, LLC, jointly d/b/a American Made Matters (collectively “Proposed Respondent”). The Commission’s Bureau of Consumer Protection (“BCP”) has prepared a draft of an administrative Complaint (“draft Complaint”). BCP and Proposed Respondents, through their authorized officers, enter into this Agreement Containing Consent Order (“Consent Agreement”) to resolve the allegations in the attached draft Complaint through a proposed Decision and Order to present to the Commission, which is also attached and made a part of this Consent Agreement.

IT IS HEREBY AGREED by and between Proposed Respondents and BCP

1. The Proposed Respondents are:

- a. Proposed Respondent Bollman Hat Company is a Pennsylvania company with its principal office or place of business at 110 East Main Street, Adamstown, Pennsylvania 19501.
- b. Proposed Respondent SaveAnAmericanJob, LLC is a Pennsylvania limited liability company with its principal office or place of business at 110 East Main Street, Adamstown, Pennsylvania 19501. SaveAnAmericanJob, LLC is a wholly owned subsidiary of Bollman Hat Company.
- c. Bollman Hat Company and SaveAnAmericanJob, LLC jointly do business as American Made Matters, a Pennsylvania fictitious name.

2. Proposed Respondents neither admit nor deny of the allegations in the Complaint, except as specifically stated in the Decision and Order. Only for purposes of this action, Proposed Respondents admit the facts necessary to establish jurisdiction.

3. Proposed Respondents waive:

- a. Any further procedural steps;
  - b. The requirement that the Commission's Decision contain a statement of findings of fact and conclusions of law; and
  - c. All rights to seek judicial review or otherwise to challenge or contest the validity of the Decision and Order issued pursuant to this Consent Agreement.
4. This Consent Agreement will not become part of the public record of the proceeding unless and until it is accepted by the Commission. If the Commission accepts this Consent Agreement, it, together with the draft Complaint, will be placed on the public record for 30 days and information about them publicly released. Acceptance does not constitute final approval, but it serves as the basis for further actions leading to final disposition of the matter. Thereafter, the Commission may either withdraw its acceptance of this Consent Agreement and so notify Proposed Respondents, in which event the Commission will take such action as it may consider appropriate, or issue and serve its Complaint (in such form as the circumstances may require) and decision in disposition of the proceeding, which may include an Order. ~~See~~ Section 2.34 of the Commission's Rules, 16 C.F.R. § 2.34.
  5. If this agreement is accepted by the Commission, and if such acceptance is not subsequently withdrawn by the Commission pursuant to Commission Rule 2.34, the Commission may, without further notice to Proposed Respondents: (1) issue its Complaint corresponding in form and substance with the attached draft Complaint and its Decision and Order; and (2) make information about them public. Proposed Respondents agree that service of the Order may be effected by its publication on the Commission's website (ftc.gov), at which time the Order will become final. *See* Rule 2.32(d). Proposed Respondents waive any rights they have to any other manner of service. *See* Rule 4.4.
  6. When final, the Decision and Order will have the same force and effect and may be altered, modified, or set aside in the same manner and within the same time provided by statute for other Commission orders.
  7. The Complaint may be used in construing the terms of the Decision and Order. No agreement, understanding, representation, or interpretation not contained in the Decision and Order or in this Consent Agreement may be used to vary or contradict the terms of the Decision and Order.
  8. Each Proposed Respondent agrees to comply with the terms of the proposed Decision and Order from the date it signs this Consent Agreement. Proposed Respondents understand that they may be liable for civil penalties and other relief for each violation of the Decision and Order after it becomes final.

BOLLMAN HAT COMPANY,  
ALSO D/B/A  
AMERICAN MADE MATTERS

FEDERAL TRADE COMMISSION

\_\_\_\_\_  
Chris Fitterling  
Executive Vice President of Administration  
Bollman Hat Company

\_\_\_\_\_  
Julia Solomon Ensor  
Attorney  
Division of Enforcement  
Bureau of Consumer Protection

Date:\_\_\_\_\_

APPROVED:

SAVEANAMERICANJOB, LLC,  
ALSO D/B/A  
AMERICAN MADE MATTERS

\_\_\_\_\_  
Laura Koss  
Assistant Director  
Division of Enforcement  
Bureau of Consumer Protection

\_\_\_\_\_  
Don Rongione  
Founder and President  
SaveAnAmericanJob, LLC

Date:\_\_\_\_\_

\_\_\_\_\_  
James A. Kohm  
Associate Director  
Division of Enforcement  
Bureau of Consumer Protection

\_\_\_\_\_  
Kenneth M. Vorrasi

UNITED STATES OF AMERICA  
BEFORE THE FEDERAL TRADE COMMISSION

COMMISSIONERS: Maureen K. Ohlhausen, Acting Chairman  
Terrell McSweeney

In the Matter of

BOLLMAN HAT COMPANY, a company,  
and

SAVEANAMERICANJOB, LLC, a limited  
liability company,

jointly d/b/a AMERICAN MADE MATTERS.

## Findings

1. The Respondents are:
  - a. Respondent Bollman Hat Company is a Pennsylvania company with its principal office or place of business at 110 East Main Street, Adamstown, Pennsylvania 19501.
  - b. Respondent SaveAnAmericanJob, LLC is a Pennsylvania limited liability company with its principal office or place of business at 110 East Main Street, Adamstown, Pennsylvania 19501. SaveAnAmericanJob, LLC is a wholly owned subsidiary of Bollman Hat Company.
  - c. Bollman Hat Company and SaveAnAmericanJob, LLC jointly do business as American Made Matters, a Pennsylvania fictitious name.
2. The Commission has jurisdiction over the subject matter of this proceeding and over the Respondent, and the proceeding is in the public interest.

## ORDER

### Definitions

For purposes of this Order, the following definitions apply:

- A. "Certification Standard" means any independently developed and objectively applied criteria Respondent set for products or services to meet in order to use Respondent Certification or other marketing or promotional material, including Respondent's "American Made Matters" materials, which substantiate the claim being made.
- B. "Certification" means any seal, logo, emblem, shield, or other insignia that expresses or implies approval or endorsement of any product, package, service, practice, or program, or any attribute thereof.
- C. "Clear(ly) and conspicuous(ly)" means that a required disclosure is difficult to miss (i.e., easily noticeable) and easily understandable by ordinary consumers, including in all of the following ways
  1. In any communication that is solely visual or solely audible, the disclosure must be made through the same means through which the communication is presented. In any communication made through both visual and audible means, such as a television advertisement, the disclosure must be presented simultaneously in both the visual and audible portions of the communication even if the representation requiring the disclosure ("triggering representation") is made through only one means

2.

actual notice of this Order, whether acting directly or indirectly, in connection with the

- B. Respondents Certification or any other promotional materials clearly and prominently disclose(s) that products or services may meet Respondent Certification Standard through self certification.

#### IV. SUBSTANTIATION

IT IS FURTHER ORDERED that Respondent Respondents officers, agents, servants employees, and attorneys, and all other persons in active concert or participation with any of them, who receive actual notice of this Order, whether acting directly or indirectly, in connection with promoting or offering for sale any product or s



this Order to: (1) all principals, officers, directors, and ~~C~~managers and members;  
(2)



IX.  
COMPLIANCE MONITORING

IT IS FURTHER ORDERED that, for the purpose of monitoring Respondent compliance with this Order:

- A. Within 10 days of receipt of a written request from a representative of the Commission, each Respondent must: submit additional compliance reports or other requested information, which must be sworn under penalty of perjury, and produce records for inspection and copying.
- B. For matters concerning this Order, representatives of the Commission are authorized to communicate directly with each Respondent. Respondents permit representatives of the Commission to interview anyone affiliated with Respondent who has agreed to such an interview. The interview may have counsel present.
- C. The Commission may use all other lawful means, including posing through its representatives as consumers, suppliers, or other individuals or entities, to Respondent any individual or entity affiliated with Respondent, without the necessity of identification or prior notice. Nothing in this Order limits the Commission's lawful use of compulsory process, pursuant to Sections 9 and 20 of the FTC Act, 15 U.S.C. §§ 49, 57b-1.

X.  
ORDER EFFECTIVE DATE S

IT IS FURTHER ORDERED that this Order is final and effective upon the date of its publication on the Commission's website (ftc.gov) as a final order. Order will terminate 20 years from the date of its issuance (which date may be stated at the end of this Order, near Commission's seal), or 20 years from the most recent date that the United States or the Commission files a complaint (with or without accompanying settlement) in federal court alleging any violation of this Order, whichever comes later; *provided, however*, that the filing of such a complaint will not affect the duration of:

- A. Any Provision in this Order that terminates in less than 20 ye

complaint had never been filed, except that the Order will not terminate between the date such complaint is filed and the later of the deadline for appealing such dismissal or ruling and the date such dismissal or ruling is upheld on appeal.

By the Commission.

Donald S. Clark  
Secretary

SEAL:  
ISSUED: