American Made Matters Program

11. In 2010, Respondents introduced a U.S.-origin seal for marketers to use to boost the credibility of "Made in USA" claims. The seal, depicted below, is associated with "American Made Matters," which is a fictitious name registered to Respondents ("AMM"):



12. In numerous instances, including, but not limited to, the promotional materials shown in Exhibits A-E, Respondents have prominently displayed the American Made Matters seal in their promotional materials. This seal

30. In fact, products and entities using Respondents' membership logo have not been independently and objectively evaluated for compliance with Respondents' membership standard. Therefore, the representation set forth in Paragraph 29 is false or misleading.

COUNT IV (False or Unsubstantiated Representation – Third Party Products)

