





12. Part V.A. of the 2016 Order requires Chemence to submit a compliance report one year after entry of the Order.

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13. On October 17, 2017, Chemence submitted the required one-year compliance report, attached as (the “2017 Report”).

14. The 2017 Report describes Chemence’s efforts to comply with each provision of the 2016 Order. In addition to these efforts, the 2017 Report states, “To assure future compliance with the Order, Chemence has instructed members of its respective staffs having responsibility for the requirements of the Order and of their responsibility to ensure compliance with the Order . . . Chemence is confident that those instructions are sufficient to ensure compliance with the Order.” *See* Exhibit C, p.2.

15. The 2017 Report further includes a declaration under penalty of perjury that, as of October 13, 2017, “Chemence has changed the labeling on all of Chemence’s cyanoacrylate glue/superglue adhesive products sold, distributed or offered for sale or distribution, by or on behalf of Chemence to consumers to read ‘Made in USA with US and globally sourced materials.’” *Id. at* 3-4.

16. As Chemence’s

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private labeled products. In so doing, Respondents have provided the means and instrumentalities to these third party retailers for the commission of deceptive acts or practices.

31. The acts and practices Respondents as alleged in this complaint crac 23d-B9u [(in (nt) 0.003 Tf -