Bureau of Consumer Protection
Division of Enforcement

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FEDERAL EXPRESS

Frank J. Brixius Jr., Esq.
Associate General Counsel
Graco Inc.
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Dear Mr. Brixius:

UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION WASHINGTON, D.C. 20580

February 11, 2014

in USA" labels to a part now sourced overseas. This problem was caused by a
failure to update a product database to reflect a change in manufacturing facilities.

In your submissions, you stated that Graco acted quickly to implement a remedial
action plan to correct its representations and avoid future mislabeling. In frequently. addition to addressing this incident, G reviewing and updating qualified

"Made in USA" claims on its marketing materials to
prevent possible consumer confusion about the country-of-origin of other products.

Based on your statements, the staff has decided not to pursue this investigation
any further. This action should not be construed as a determination that there was no
violation of Section 5 of the Federal Trade Commission Act, 15 U.S.C. § 45. The Commission reserves the right to take such further action as