



UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20548

Bureau of Consumer Protection
Division of Enforcement

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FEDERAL EXPRESS

Steven Bright
VP of Strategy, Development and General Counsel
Rico Industries, Inc.
7200 N Austin Ave.
NACS, IL 60774

Dear Mr. Bright:

We received your submissions on behalf of Rico Industries, Inc. ("Rico" or the "Company"), explaining that in certain Hawaii retail locations where the Company mistakenly printed "Made in the USA" claim on product packaging in 2010. You stated that the Company discovered the error shortly after printing and took immediate steps to correct the error. Following an initial review of the results of an examination of incorrect claims for a small quantity of products thereafter.

In the steps that Rico has taken to ensure that its claims are accurate, all affected retail inventory. Specifically, Rico identified and destroyed all remaining affected packaging inventory and verified that all remaining packaging inventory contain proper claims. Additionally, the Company conducted a company-wide claims review and implemented new training and review procedures to ensure compliance with the FTC's Enforcement Policy Statement on U.S. Origin.

Based on your actions and other factors, the staff has decided not to pursue this investigation any further. This action should not be construed as a determination of the Federal Trade Commission reserves the right to take such further action as the public interest may require. If you have any questions, you may contact me at (202) 326-2577.

Sincerely,

Julia Solomen Ensor
Staff Attorney