UNITED STATES
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20[illegible]

Bureau of Consumer Protection
Division of Enforcement

June 1, 2016

FEDERAL EXPRESS

Cheryl Leb
Partner
Kelly Hart & Hallman LLP
201 Main Street
Suite 2500
Fort Worth, TX 76102

Dear Ms. Leb:

We received your submissions on behalf of your client, Justin Brands, Inc. ("Justin Brands" or the "Company") by D. During our review, we discussed concerns relating to potentially deceptive or overly broad domestic-origin marketing claims for the Company's [illegible] Boots, Justin [illegible] Boots, Tony Lama Boots, and Nocona Boots [illegible]

As discussed, unqualified domestic-origin claims on marketing materials likely suggest to consumers that [illegible] United States. Accordingly, you [illegible] corrective action plan to avoid deceiving consumers. Among other things, Justin Brands: (1) performed a company-wide analysis of all domestic-origin marketing claims on the Company's websites, marketing materials, social media campaigns, and point-of-sale [illegible] product lines from its other product offerings; and (3) removed or qualified all domestic-origin marketing claims where appropriate.

Based on your actions and other factors, the staff has decided not to pursue this investigation [illegible] 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 [illegible] If you have any questions, you can reach [illegible] (202) 326-2405.

Sincerely,

Crystal Ostrum
Investigator