



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

Bureau of Consumer Protection
Division of Enforcement

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VIA EMAIL

Mr. Roberto Mejía
President and Chief Executive Officer
De Roblin Corp. d/b/a Mia Secret, Inc.
17011 Green Dr.
City of Industry, CA 91745

Dear Mr. Mejía:

We received your submissions on behalf of De Roblin Corp. d/b/a Mia Secret, Inc. (“Mia Secret” or the “Company”). During our review, we discussed concerns that marketing materials may have overstated the extent to which Mia Secret cyanoacrylate nail glues are made in the United States. Specifically, although Mia Secret sources nail glues from a supplier that substantially transforms cyanoacrylates in the United States, those glues incorporate significant imported ingredients.

As discussed, unqualified U.S.-origin claims in marketing materials – including claims that products are “Made” or “Manufactured” in the USA – likely suggest to consumers that the products advertised in those materials are “all or virtually all” made in the United States.¹ The Commission may analyze a number of different factors to determine whether a product is “all or virtually all” made in the United States, including the proportion of the product’s total manufacturing costs attributable to U.S. parts and processing, how far removed any foreign content is from the finished product, and the importance of the foreign content or processing to the overall function of the product.

As you know, the fact that a supplier is based in the United States does not necessarily mean that the products it offers are “all or virtually all” made in the USA. Accordingly, “[r]ather

¹ Federal Trade Commission, *Issuance of Enforcement Policy Statement on “Made in USA” and Other U.S. Origin Claims*, 62 Fed. Reg. 63756, 63768 (Dec. 2, 1997). Additionally, beyond express “Made in USA” claims, “[d]epending on the context, U.S. symbols or geographic references, such as U.S. flags, outlines of U.S. maps, or references to U.S. locations of headquarters or factories, may, by themselves or in conjunction with other phrases or images, convey a claim of U.S. origin.” *Id.*

than *assume* the [supplier's] input is 100 percent U.S.-made, . . . manufacturers and marketers would be wise to *ask* the[ir] suppliers about the percentage of U.S. content before they make a U.S. origin claim.”²

To avoid deceiving consumers, Mia Secret implemented a remedial action plan to update its representations. This plan
