



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

Bureau of Consumer Protection  
Division of Enforcement

Julia Solomon Ensor  
Assistant Director

Email: jensor@ftc.gov  
Director

August 7, 2017

VIA FEDEX

Daniel C. Schwartz, Esq.  
Baker & Cave LLP  
1155 F Street NW  
Washington, DC 20004-1557

Dear Mr. Schwartz:

We received your letter dated 7/16/17 regarding your concerns about the marketing materials that may have overstated the extent of products, including certain ice machines, are made in the United States. Specifically, although the products were assembled in the U.S., certain components were imported from other countries. Additionally, a small number of the Company's products are wholly manufactured overseas.

As discussed in our letter dated 7/19/17, the Company's "Made in USA" claims on company marketing materials may suggest to consumers that all products advertised in those materials are "all or mostly made in the United States." In response, the Commission implemented a comprehensive remedial action plan that included: (1) removing general statements on marketing materials that Hoshizaki products are made in the United States; (2) sending letters to distributors to update claims; (3) providing stickers to distributors to place over claims in printed materials while updated versions were being generated; (4) updating YouTube videos, and (5) making all diligent efforts to identify and remove any remaining instances.

Based on your statements and other factors, in the course of our ongoing investigations, and further, this letter should not be construed as a finding of no violation of the FTC Act. The Commission reserves the right to take such action as it deems appropriate if you have any questions, you may reach me at (202) 326-7377.

Sincerely,

Julia Solomon Ensor  
Staff Attorney