



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

Bureau of Consumer Protection
Division of Enforcement

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VIA EMAIL

J.P. Brice, CEO
Ironcompany.com Inc., d/b/a Iron Company
7349 Milliken Ave # 140-332
Rancho Cucamonga, CA 91730-7435

Dear Mr. Brice:

We received your submissions on behalf of Ironcompany.com Inc., d/b/a Iron Company (“Iron Company” or the “Company”). During our review, we discussed concerns that marketing materials may have overstated the extent to which the products Iron Company sells are made in the United States, when products featured in Company materials actually include a mix of made in USA, assembled in USA, and imported products.

As discussed, unqualified U.S.-origin claims in marketing materials – including claims that products are “Made,” “Built,” or “Manufactured” in the USA – likely suggest to consumers that all 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.

To avoid deceiving consumers, Iron Company implemented a remedial action plan to clarify its representations. The plan included: (1) removing broad U.S.-origin claims from the Company website and social media profiles; (2) clarifying that only certain products sold are

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.*
