



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

Bureau of Consumer Protection
Division of Enforcement

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Attorney

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VIA FEDEX

Jeffrey Margulies, Esq.
Norton Rose Fulbright US LLP
555 South Flower Street
Forty-Fifth Floor
Los Angeles, CA 90071

Dear Mr. Margulies:

We received your submission on behalf of Prime-Line Products Company ("Prime-Line"). During our review, we discussed concerns relating to certain Prime-Line corner shields in the marketplace.

In response to our inquiry, Prime-Line and Cinnge made corner shields. This spring, Prime-Line and Cinnge reported that Prime-Line did not realize labels applied to the corner shields in USA. Prime-Line then directed product down to prevent further sales until it corrected all labels. Prime-Line also inspected its inventory to ensure all other products were labeled properly.

Based on Prime-Line's explanation and our investigation, we have determined that there is no violation of Section 5 of the Federal Trade Commission Act, 15 U.S.C. § 495. The Commission reserves the right to take such further action as the public interest requires. If you have any questions, you can reach me at (202) 326-2377.

Sincerely,

Julia Solomon Ensor
Staff Attorney

¹ The affected corner shields, which were sold online, were not advertised as "made in USA." The confusing labeling was not visible to consumers at point of purchase.