



UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION

Department of Consumer Protection
Division of Enforcement

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VIA FEDEX

Emma E. Collum, Esq.
In House Counsel
JL Audio Inc.
10369 North Commerce Parkway
Merritt, FL 32925-2062

Dear Ms. Collum:

We received your submissions on behalf of JL Audio. In our review, we raised concerns that certain marketing materials may have overstated that JL Audio's audio equipment products, including car and marine audio systems, are made in the United States.

As discussed, unqualified "Made in USA" or "Built in USA" claims may suggest to consumers that products are made in the United States. We may analyze a number of different factors to determine whether a product is "all or virtually all" made in the United States, including the relative value of the components 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.

In this case, although JL Audio assembles products in the United States, many of its products are made with unqualified "Made in USA" statements. To avoid deception, JL Audio implemented a remedial action plan to qualify its representations. This plan included: (1) removing all unqualified "Made in USA" statements from marketing materials, including packaging and inserts, and replacing such statements with "Built in USA with Global Components"; (2) updating packaging, stickers, and inserts to increase the prominence of qualifications to U.S.-originated; (3) updating product marketing materials and instruction manuals; (4) updating social media posts; (5) updating website content; (6) providing written notice to authorized dealers and distributors that they should not make unqualified "Made in USA" claims; and (7) making an urgent effort to identify and correct improper claims made by third-party marketers.

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