



deception about the presence or amount of foreign content. In order to be effective, any qualifications or disclosures should be sufficiently clear, prominent, and understandable to prevent deception.”²

To avoid deceiving consumers, LumenFocus implemented a remedial action plan to update and qualify its representations. This plan included: (1) updating marketing materials to clarify or correct U.S.-origin representations; (2) updating social media platforms; (3) training marketing staff; (4) communicating changes to third-party distributors and energy service companies; and (5) assigning direct responsibility
