



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

Bureau of Consumer Protection  
Division of Enforcement

Julia Solomon Ensor  
Attorney

Email: [jensor@ftc.gov](mailto:jensor@ftc.gov)  
Direct Dial: (202) 326-2377

June 2, 2022

**VIA EMAIL**

Richard P. Lawson, Esq.  
Gardner Brewer Martinez-Monfort  
400 N. Ashley Dr., Ste. 1100  
Tampa, FL 33602  
[RLawson@gbmmlaw.com](mailto:RLawson@gbmmlaw.com)

Dear Mr. Lawson:

We received your submissions on behalf of Streamline Washdown Equipment, Inc. (“Streamline” or the “Company”). During our review, we discussed concerns that marketing materials may have overstated the extent to which the Company’s products are made in the United States. Specifically, among other things, Streamline embossed “Made in USA” statements on the rubber casings of certain industrial spray nozzles that incorporated significant imported content.


As discussed, unqualified U.S.-origin claims in marketing materials – including claims that products are “Made” or “Built” in the USA – likely suggest to consumers that the products advertised in those materials are “all or virtually all” made in the United States.<sup>1</sup> 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

---

As discussed, it is appropriate for Streamline to promote the fact that it employs workers and performs certain functions in the United States. However, marketing materials should not convey that products are wholly or partially made in the United States unless the Company can substantiate those claims. Accordingly, to avoid deceiving consumers, Streamline removed all U.S.-origin claims from products and marketing materials and required dealers and distributors to do the same.<sup>3</sup>

FTC staff members are available to work with companies to craft claims that serve the dual purposes of conveying non-deceptive information and highlighting work done in the United States. Based on Streamline's actions and other factors, the staff has decided not to pursue this investigation any further. This action should not be construed as a determination that there was no violation of Section 5 of the Federal Trade Commission Act, 15 U.S.C. § 45. The Commission reserves the right to take such further action as the public interest may require. If you have any questions, please feel free to call.

Sincerely,



Julia Solomon Ensor  
Staff Attorney



Lashanda Freeman  
Senior Investigator

---

product occurs in the United States, and all or virtually all ingredients or components of the product are made and sourced in the United States. *See* <https://www.federalregister.gov/documents/2021/07/14/2021-14610/made-in-usa-labeling-rule>. Pursuant to 15 U.S.C. § 45(m)(1)(A), the Commission may seek civil penalties of up to \$46,517 per MUSA Rule violation.

<sup>3</sup> Streamline will not provide products to noncompliant dealers and distributors. Online marketing materials that include outdated claims are associated with dormant websites or third parties without current authorization to sell Streamline products.