



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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April 15, 2016

**FEDERAL EXPRESS**

Steven Bright  
VP of Strategic Development and General Counsel  
Rico Industries, Inc.  
7000 N Austin Ave.  
Niles, IL 60714

Dear Mr. Bright:

We received your submissions on behalf of Rico Industries, Inc. (“Rico” or the “Company”), explaining that Rico inadvertently made misleading “Made in the USA” claims for certain nylon National Football League-branded wallets. Specifically, although affected wallets were made overseas, the Company mistakenly printed “Made in the USA” claims on product packaging in 2014. You stated that the Company discovered the error shortly after printing and took immediate corrective action. However, the Company missed certain inventory during this initial review, which resulted in dissemination of inaccurate claims for a small quantity of wallets thereafter.

In your submissions, you outlined several steps that Rico has since taken to ensure that its corrective actions extended to all affected wallets in inventory. Specifically, Rico identified and destroyed all remaining affected packaging inventory and verified that all current artwork and packaging inventory contain proper claims. Additionally, the Company conducted a company-wide claims review, and implemented new training and review procedures to ensure continuing compliance with the FTC’s Enforcement Policy Statement on U.S. Origin Claims.

Based on your 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, you can reach me at (202) 326-2377.

Sincerely,

A handwritten signature in blue ink, appearing to read "J. Ensor".

Julia Solomon Ensor  
Staff Attorney