



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

Bureau of Consumer Protection
Division of Enforcement

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FEDERAL EXPRESS

Kathleen A. Juniper, Esq.
BuchalterNemer, P.C.
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Dear Ms. Juniper:

We received your submissions of March 10, March 17, March 28, and April 25, 2014, on behalf of your client, Karen Kane, Inc. (“Karen Kane” or the “Company”). In correspondence and discussions, you explained that Karen Kane mistakenly made overly broad “Made in USA” claims for certain clothing items made from imported fabrics, including in connection with the Company’s use of the Made in the USA Brand, LLC Certification Mark.

In your submissions, you explained that Karen Kane implemented a remedial action plan to correct its representations. This plan included: (1) removing the Made in the USA Brand, LLC Certification Mark from the Company’s website; (2) applying updated hang-tags to clothing disclosing imported content; and (3) developing written policies and procedures regarding U.S.-origin marketing claims.

Based on your statements, 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