



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
Direct Dial: (202) 326-2377

August 21, 2014

U.S. MAIL

Ms. Amy Orsak
Marketing and Design Manager
Circle Y Saddles, Inc.
P.O. Box 271
Yoakum, TX 77995

Dear Ms. Orsak:

We received your submissions of August 6 and August 21, 2014 on behalf of Circle Y Saddles, Inc. ("Circle Y" or the "Company"). During our review, we discussed that statements in Circle Y's marketing materials may have overstated the extent to which certain saddles, saddlebags, and tack items containing imported content were made in the United States.

In your submissions, you explained that the Company implemented a remedial action plan to correct its representations. This plan included: (1) updating the website to remove overly broad claims; (2) adding product origin disclaimers to imported products; (3) updating the Company's catalogues; and (4) removing "Made in the USA" claims from warranty cards for imported saddles.

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