



UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
600 PENNSYLVANIA AVENUE, NW
WASHINGTON, DC 20580

Division of Enforcement
Bureau of Consumer Protection

September 6, 2012

FEDERAL EXPRESS

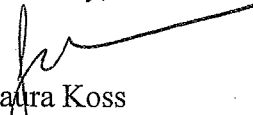
Mr. Michael A. Lindsay
Dorsey & Whitney, LLP
50 South Sixth Street, Suite 1500
Minneapolis, Minnesota 55402

Dear Mr. Lindsay:

The staff of the Federal Trade Commission has received your submissions of July 30, 2012 and August 14, 2012 on behalf of Gilmour Manufacturing Company, Inc. ("Gilmour"). In our correspondence and discussions, you indicated that some of Gilmour brand nozzles may have been inadvertently advertised as "Made in USA" despite being made in China. You explained that Gilmour transferred production of its nozzles from the United States to Asia. Although product packaging correctly reflected this fact, the company's website contained outdated photography incorrectly stating that some products were U.S.-made. After receiving Commission staff's letter, you state that Gilmour has taken down its website while it corrects its representations. You also state that Gilmour is auditing its retailers' web pages to ensure they are using updated images.

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 ("FTC 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, I can be reached at (202) 326-2890.

Sincerely,



Laura Koss
Staff Attorney