

**UNITED STATES OF AMERICA  
BEFORE THE FEDERAL TRADE COMMISSION**

**COMMISSIONERS:       Maureen K. Ohlhausen, Acting Chairman  
                              Terrell McSweeney**

	)	
<b>In the Matter of</b>	)	
<b>BLOCK DIVISION, INC.,</b>	)	<b>Docket No.</b>
<b>a corporation.</b>	)	
	)	
	)	

**COMPLAINT**

The Federal Trade Commission, having reason to believe that Block Division, Inc., a corporation (“Respondent”), has violated the provisions of the Federal Trade Commission Act, and it appearing to the Commission that this proceeding is in the public interest, alleges:

1. Respondent Block Division, Inc. (“Block Division”) is a Texas corporation with its principal place of business at 618 Front St., Wichita Falls, TX 76301.
2. Respondent advertises, labels, offers for sale, and distributes products to consumers, including, but not limited to, pulley blocks. Respondent advertises these products on its website, in stores, at trade shows, through social media, and through flyers and pamphlets. Respondent offers for sale, sells, and distributes its products throughout the United States.
3. The acts and practices of Respondent alleged in this complaint have been in or affecting commerce, as “commerce” is defined in Section 4 of the Federal Trade Commission Act.
4. Respondent has disseminated or has caused to be disseminated advertisements and promotional materials for its products. These materials contain the following statements, among others:

A. “Made in USA”



**Block Division, Inc.**  
November 25 at 11:39am · 🌐

Hunting? Boat storage? Creating a theater or stage production? We offer a variety of pulley blocks to meet your needs!  
<http://www.blockdivision.com/Block-and-Tackle-Rope-Pulleys-...>

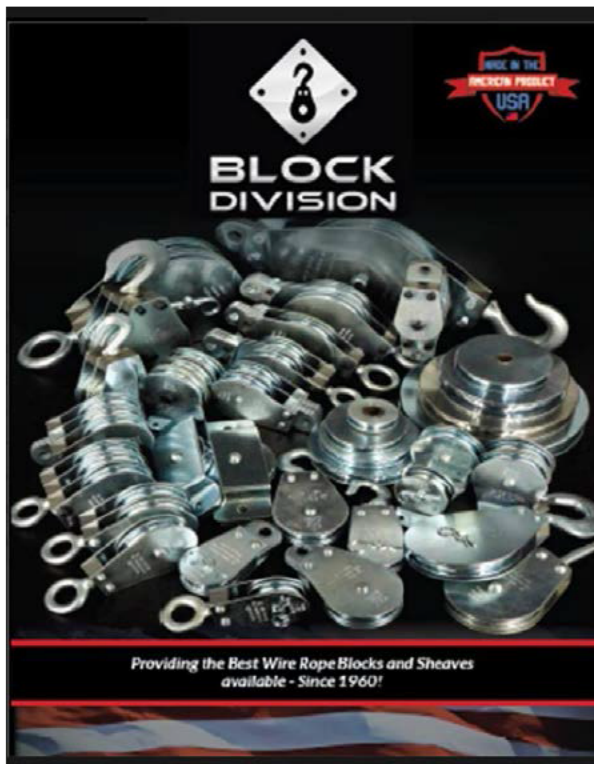
 **Block and Tackle Pulley Systems, Sheaves Snatch Bushings**  
Small to large, light to heavy duty, industrial block and tackle pulley systems; zinc electroplated or stainless steel; swivel, fixed hook, eye, flat...  
[WWW.BLOCKDIVISION.COM](http://WWW.BLOCKDIVISION.COM)

3 Likes 1 Share

➦ Share

(Product photograph; Facebook ad); and

B. “Made in the USA American Product”



(Block Division catalogue).

5. In numerous instances, including, but not limited to, in the promotional materials referenced in Paragraph 4, Respondent has represented, expressly or by implication, that its pulley blocks and other products are all or virtually all made in the United States.

6. In fact, Respondent's pulley blocks and other products incorporate significant imported parts essential to the function of Respondent's products. Among other things, for a period of several years, Respondent's pulleys incorporated imported steel plates that entered the United States from overseas already stamped "Made in USA."

7. Therefore, Respondent's claims that its products are made in the United States deceive consumers.

### **COUNT I (False or Unsubstantiated Representation)**

8. In connection with the manufacturing, labeling, advertising, promotion, offering for sale, sale, or distribution of its products, Respondent has represented, directly or indirectly, expressly or by implication, that such products, including the parts used to make such products, are all or virtually all made in the United States.

9. In fact, in many instances, Respondent's products include significant imported parts, and those parts are essential to the function of Respondent's pulley blocks. Therefore, the representation set forth in Paragraph 8 is false or misleading, or was not substantiated at the time the representation was made.

### **VIOLATION OF SECTION 5**

10. The acts and practices of Respondent, as alleged in this complaint, constitute unfair or deceptive acts or practices in or affecting commerce in violation of Section 5(a) of the Federal Trade Commission Act.

THEREFORE, the Federal Trade Commission this \_\_\_\_\_ day of \_\_\_\_\_, 2017, has issued this Complaint against Respondents.

By the Commission.

[Donald S. Clark]  
Secretary

SEAL: