



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](mailto:jensor@ftc.gov)  
Direct Dial: (202) 326-2377

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**FEDERAL EXPRESS**

Mark A. Rosebrock, Esq.  
SVP-Global Legal Affairs & General Counsel  
The Coleman Company, Inc.  
1767 Denver West Boulevard  
Golden, CO 80401

Dear Mr. Rosebrock:

We received your submissions on behalf of The Coleman Company, Inc. ("Coleman" or the "Company"). During our review, you explained that Coleman inadvertently made deceptive "Made in USA" claims for certain disposable butane lighters. Specifically, a vendor mistakenly printed packages with unqualified "Made in USA" claims, and retailers sold them to consumers.

In its submissions, the Company provided documentation of Coleman's rigorous, multilayered review process for country-of-origin claims. In this instance, documentation showed that Coleman personnel, including legal personnel, reviewed claims and instructed the packaging vendor to label the lighters at issue "Made in China." Nonetheless, the vendor printed "Made in USA" on the product packaging, and mislabeled product was distributed to retailers.

It appears that, upon learning of this mistake, Coleman took several steps to prevent consumer deception. These steps included: (1) destroying remaining mislabeled product in inventory; (2) confirming that new labels for the product contained correct country-of-origin information; (3) spot-checking claims on a random sample of Coleman products; and (4) submitting examples of Coleman's "Made in USA" labels and labeling policies to FTC staff for review and informal staff feedback.

Based on Coleman's statements and actions, 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