



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

Bureau of Consumer Protection  
Division of Enforcement

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April 10, 2014

**FEDERAL EXPRESS**

Michael J. Abrams  
Lathrop & Gage LLP  
2345 Grand Blvd., Suite 2200  
Kansas City, MO 64108  
mabrams@lathropgage.com

Dear Mr. Abrams:

We received your submissions of March 6, 2014, April 1, 2014, and April 4, 2014, on behalf of your client, Shinn Fu Company of America, Inc. ("Shinn Fu"). In correspondence and discussions, you explained that Shinn Fu mistakenly made misleading "Made in USA" claims for two service jacks and two jack stands sold under its Hein-Werner line that contain significant imported content.

In your submissions, you explained that Shinn Fu implemented a remedial action plan to correct its representations. This plan included relabeling affected products with the qualified claim "Assembled in the US with US and Global Components," and revising website copy and other promotional materials accordingly.

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 black ink, appearing to read "J. Ensor".

Julia Solomon Ensor  
Staff Attorney