



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

July 28, 2014

FEDERAL EXPRESS

Mr. Marc Morales
Vice President, Business Development
Windward Design Group, Inc.
1130 Commerce Blvd
Sarasota, FL 34243

Dear Mr. Morales:

We received your submissions of March 14, March 31, and April 17, 2014 on behalf of Windward Design Group, Inc. ("Windward"). During our review, we discussed that statements in Windward's marketing materials, including materials featuring the Made in the USA Brand, LLC Certification Mark, may have overstated the extent to which certain outdoor furniture and accessory products containing imported content were made in the United States.

In your submissions, you explained that Windward implemented a remedial action plan to correct its representations. This plan included: (1) removing the Made in the USA Brand, LLC Certification Mark from the Windward website and catalogues; (2) updating marketing materials to clarify that some products contain imported content; and (3) closely monitoring U.S.-origin claims going forward.

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