



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

Bureau of Consumer Protection
Division of Enforcement

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October 6, 2014

FEDERAL EXPRESS

Mr. John M. Scott
Executive Vice President
Croakies, Inc.
1240 Huff Lane
Jackson, WY 83001

Dear Mr. Scott:

We received your submissions of September 5 and October 1, 2014 on behalf of Croakies, Inc. ("Croakies"). During our review, we discussed that statements in Croakies' marketing materials may have overstated the extent to which certain eyeglass retainers containing imported content were made in the United States.

In your submissions, you explained that Croakies implemented a remedial action plan to correct its representations. This plan included: (1) updating the website to remove overly broad claims; (2) reviewing product packaging; (3) revising business cards to remove unqualified U.S.-origin claims; and (4) providing guidance and background on making U.S.-origin claims to marketing, art, production, and sales personnel.

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