



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

Bureau of Consumer Protection  
Division of Enforcement

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February 18, 2015

**FEDERAL EXPRESS**

Lloyd C. Chatfield II, Esq.  
100 S. Saunders Road, Suite 150  
Lake Forest, IL 60045

Dear Mr. Chatfield:

We received your submissions of August 5, 2014, August 25, 2014, September 22, 2014, October 2, 2014, October 17, 2014, November 11, 2014, and January 26, 2015, on behalf of your client, Florida Tile, Inc. ("Florida Tile"). In correspondence and discussions, you explained that certain of Florida Tile's marketing materials may have overstated the extent to which some product lines, consisting of floor and wall tile containing domestic and imported content, were made in the United States. As we discussed, to avoid deceiving consumers with an unqualified "Made in USA" claim about a product line, every product in that line must be "all or virtually all" made in the United States.

In your submissions, you explained that Florida Tile implemented a remedial action plan to correct and clarify its representations. This plan included: (1) updating the "Made in USA" page on Florida Tile's website; (2) updating website product descriptions; (3) updating printed product literature; and (4) adding a clarifying label to architectural binders, sample boards, contractor boards, and cradles.

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