



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

Bureau of Consumer Protection  
Division of Enforcement

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March 30, 2015

**FEDERAL EXPRESS**

Andrew Gao, CEO  
Global Syn-Turf, Inc.  
2482 Technology Drive  
Hayward, CA 94545

Dear Mr. Gao:

We received your submissions of March 13, 2015, March 18, 2015, and March 19, 2015, on behalf of Global Syn-Turf, Inc. ("GST"). During our review, we discussed concerns that certain marketing materials may have overstated the extent to which GST sells products that are made in the United States. You explained that GST has recently introduced a new line of artificial grass products – the Patriot Series – that is made in the United States, but that the company continues to sell other products that are manufactured overseas.

As we discussed, unqualified "Made in USA" claims on company marketing materials likely suggest to consumers that all products advertised in those materials are "all or virtually all" made in the United States. Accordingly, to avoid deceiving consumers, you explained that GST made several changes to its website and other materials to clarify that the company's "Made in USA" claims apply only to the Patriot Series. These changes included updating claims on marketing materials to specify "Patriot Series Made in the USA," and updating GST's website to make it easier for consumers to locate Patriot Series products.

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