



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

Bureau of Consumer Protection
Division of Enforcement

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December 16, 2015

FEDERAL EXPRESS

Mr. Lane Tobiassen
Chief Executive Officer and President
Crimson Trace Corporation
9780 SW Freeman Drive
Wilsonville, OR 97070-9221

Dear Mr. Tobiassen:

We received your submissions on behalf of Crimson Trace Corporation (“Crimson Trace”). During our review, we raised concerns that certain marketing materials may have overstated the extent to which Crimson Trace’s laser sighting and other products are made in the United States. Specifically, although Crimson Trace designs, assembles, markets, and supports products in the United States, certain products incorporate significant imported content.

As discussed, unqualified “Made in USA” claims on 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 Crimson Trace implemented a comprehensive remedial action plan to clarify its representations. This plan included: (1) removing unqualified claims from the Crimson Trace website and other electronic marketing venues; (2) updating packaging, labels, and instruction manuals, including by placing stickers over unqualified claims until materials could be reprinted; (3) scrapping certain molded parts and outdated marketing materials; (4) providing updated materials to third-party marketers; and (5) conducting a sweep to identify and request removal of claims from third-party websites.

Based on your actions and other factors, 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