



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

Bureau of Consumer Protection  
Division of Enforcement

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February 9, 2016

**FEDERAL EXPRESS**

Hector Penton, COO  
Origin PC Corporation  
12400 SW 134 Court, Suite #1  
Miami, FL 33186

Dear Mr. Penton:

We received your submissions on behalf of Origin PC Corporation (“Origin”). During our review, we raised concerns that certain marketing materials may have overstated the extent to which Origin computers are made or “built” in the United States.

As we discussed, unqualified “Made in the USA” or “Built in the 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. The Commission may analyze a number of different factors to determine whether a product is “all or virtually all” made in the United States, including the proportion of the product’s total manufacturing costs attributable to U.S. parts and processing, how far removed any foreign content is from the finished product, and the importance of the foreign content or processing to the overall function of the product.

In this case, you explained that Origin completes final assembly of computers in the United States using significant imported parts. Accordingly, to avoid deceiving consumers, Origin removed all “Built in the USA” claims from its marketing materials, and replaced them with the claim, “24/7 US Based Support.”

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