



Bureau of Consumer Protection
Division of Enforcement

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

June 1, 2016

FEDERAL EXPRESS

Cheryl Leb
Partner
Kelly Hart & Hallman LLP
201 Main Street
Suite 2500
Fort Worth, TX 76102

Dear Ms. Leb:

We received your submissions on behalf of your client, Justin Brands, Inc. ("Justin Brands" or the "Company"). During our review, we discussed concerns relating to potentially deceptive or overly broad domestic-origin marketing claims for the Company's Chippewa, Justin Boots, Justin Original Work Boots, Tony Lama Boots, and Nocona Boots brands.

As discussed, unqualified domestic-origin 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, you explained that the Company implemented a comprehensive corrective action plan to avoid deceiving consumers. Among other things, Justin Brands: (1) performed a company-wide analysis of all domestic-origin marketing claims on the Company's websites, marketing materials, social media campaigns, and point of sale items; (2) made substantial changes to its websites to distinguish the Company's "Handcrafted in the USA" product lines from its other product offerings; and (3) removed or qualified all domestic-origin marketing claims where appropriate.

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) 326-3405.

Sincerely,

A handwritten signature in blue ink, appearing to read "Crystal Ostrum".

Crystal Ostrum
Investigator