



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

Bureau of Consumer Protection
Division of Enforcement

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Attorney

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February 27, 2018

VIA FEDEX

Rebecca Boenigk, CEO
Neutral Posture, Inc.
3904 N. Texas Avenue
Bryan, TX 77803

Dear Ms. Boenigk:

We received your submissions on behalf of Neutral Posture, Inc. ("Neutral Posture"). During our review, we discussed concerns that certain marketing materials may have overstated the extent to which Neutral Posture products, including, but not limited to, certain ergonomic seating products and accessories, are made in the United States.

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, Neutral Posture implemented a remedial action plan to avoid deceiving consumers. This plan included: (1) stickering over "Made in USA" claims on existing marketing materials; (2) reprinting marketing materials without "Made in USA" claims; (3) removing "Made in USA" claims from the Neutral Posture website and social media accounts; and (4) communicating changes to dealers and third-party retailers.

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", written over a circular stamp or mark.

Julia Solomon Ensor
Staff Attorney