



United States of America  
FEDERAL TRADE COMMISSION  
Washington, D.C. 20580

Division of Advertising Practices

May 9, 2016

Andrea C. Levine, Esq.  
Senior Vice President, Director  
National Advertising Division  
112 Madison Avenue, 3<sup>rd</sup> Floor  
New York, NY 10016

Re: Advertising Claims for New Nordic USA, Inc. (Skin Care™ Collagen Filler)

Dear Ms. Levine:

I am writing to follow up on your referral to the FTC of the above-mentioned matter. Your referral indicated that the advertiser, New Nordic USA, Inc., had agreed to comply with the NAD's recommendation to discontinue challenged print advertising claims for this product but failed to do so in a timely manner.

We contacted the principal of New Nordic USA, Inc., who agreed to cooperate with the NAD's inquiry. Since then, we have been in communication with Annie Ugurlayan, the NAD attorney handling this matter, about that status of New Nordic's cooperation. We understand that New Nordic now has discontinued disseminating the challenged marketing claims. Moreover, Ms. Ugurlayan informed us that New Nordic's principal is aware of the type of evidence needed to support various health efficacy claims, and he has agreed that his company will not make claims in future advertising for any New Nordic products without adequate substantiation.

Accordingly, it appears no additional FTC action is warranted at this time. Our decision is not to be construed as a determination that a violation has not occurred. The Commission reserves the right to take such further action as the public interest may require. The FTC fully supports the NAD's self-regulatory process, and we appreciate your referral and the opportunity to continue to assist in supporting the NAD.

Very truly yours,

Mary K. Engle  
Associate Director for Advertising Practices