

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

OAK STREET MANUFACTURING COMPANY,  
LLC, a limited liability company, also d/b/a Oak  
Street Bootmakers,

Defendant.

Case No. \_\_\_\_\_

**COMPLAINT FOR  
PERMANENT INJUNCTION,  
MONETARY JUDGMENT, AND  
OTHER RELIEF**

Plaintiff, the Federal Trade Commission (“FTC” or “Commission”), for its Complaint alleges:

1. The FTC brings this action for Defendant’s violations of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), 15 U.S.C. § 45a (“Section 45a”), and the Made in the USA Labeling Rule (“MUSA Labeling Rule”), 16 C.F.R. Part 323. For these violations, the FTC seeks relief, including a permanent injunction, monetary relief, and other relief, pursuant to Sections 13(b) and 19 of the FTC Act, 15 U.S.C. §§ 53(b), 57b, and the MUSA Labeling Rule, 16 C.F.R. Part 323.

**SUMMARY OF THE CASE**

2. Oak Street Manufacturing Company, LLC, d/b/a Oak Street Bootmakers (“Oak Street”), markets and sells purportedly “handcrafted American” footwear (*e.g.*, boots, loafers, bluchers, oxfords, and moccasins) and footwear accessories to consumers under the Oak Street brand (“Oak Street footwear products”).

3. For several years, Defendant has repeatedly and prominently represented, both expressly and by implication, that its Oak Street footwear products are wholly handcrafted in the United States.

4. In advertising and labeling, Defendant has represented, among other things, that Oak Street footwear products “meet[] the minimum FTC requirements to claim ‘Made in USA[,]’” and that “all components are crafted by hand, not pre-assembled overseas[.]” According to Oak Street founder George Vlagos, “‘Made in USA’ is not [a] selling point—it’s the whole point” for Oak Street.

5. In addition, from approximately 2020 through August 2025, Defendant even claimed that Oak Street footwear products exceeded the FTC’s “Made in USA” standard. During this period, in advertising and labeling, Defendant touted Oak Street footwear products as “More than Made in USA™[.]” To promote its “More than Made in USA” representations, Defendant maintained a dedicated page on the Oak Street website that described the key differences between Oak Street and other American shoemakers.

6. Despite these repeated “Made in USA” representations, since at least August 2021, Defendant has sold thousands of Oak Street footwear products—boots, loafers, bluchers, oxfords, and moccasins—that are not, in fact, “Made in USA.”

7. Since approximately May 2023, Defendant engaged a factory in the Dominican Republic to produce “uppers,” the top portion of footwear covering the toes, sides, and heel. Oak Street also sourced outsoles from a factory in Brazil. Defendant then shipped these components to a U.S. facility. That facility assembled, or “bottomed,” the uppers and outsoles into completed shoes. As a result, Oak Street sold thousands of Oak Street footwear products to consumers that did not actually meet the “Made in USA” requirements under Section 5 of the FTC Act and MUSA Labeling Rule.

8. Consumers have been harmed by Defendant’s false or misleading “Made in USA” advertising and labeling claims. Consumers have paid hundreds of dollars to purchase Oak Street footwear products touted as “Made in USA” when, in fact, such products were manufactured or

assembled in significant part in the Dominican Republic. Consumers also have been deprived of material information about the true nature and origin of these deceptively marketed boots, loafers, bluchers, oxfords, and moccasins.

### **JURISDICTION AND VENUE**

9. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331, 1337(a), and 1345.

10. Venue is proper in this District under 28 U.S.C. §§ 1391 (b)(1), (b)(2), (c)(1), (c)(2), and (d), and 15 U.S.C. § 53(b).

### **PLAINTIFF**

11. The FTC is an agency of the United States Government created by the FTC Act, which authorizes the FTC to commence this district court civil action by its own attorneys. 15 U.S.C. §§ 41–58. The FTC enforces Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), which prohibits unfair or deceptive acts or practices in or affecting commerce.

12. The FTC also enforces Section 45a, which states: “[t]o the extent any person introduces, delivers for introduction, sells, advertises, or offers for sale in commerce a product with a ‘Made in the U.S.A.’ or ‘Made in America’ label, or the equivalent thereof, in order to represent that such product was in whole or substantial part of domestic origin, such label shall be consistent with decisions and orders of the Federal Trade Commission issued pursuant to section 45 of [Title 15].” The decisions and orders of the FTC provide, in part, that a representation that a product is made in the United States will not be a violation so long as all, or virtually all, of the component parts of the product are made in the United States and all, or virtually all, of the labor in manufacturing the product is performed in the United States.

13. The FTC also enforces the MUSA Labeling Rule, 16 C.F.R. Part 323, which prohibits labeling any product with an unqualified “Made in USA” or similar country-of-origin

claim unless the final assembly or processing of the products occurs in the United States, all significant processing that goes into the product occurs in the United States, and all or virtually all ingredients or components of the product are made and sourced in the United States. 16 C.F.R. § 323.2. This prohibition on false or misleading “Made in the USA” labeling also extends to claims on a “seal, mark, tag, or stamp” used in print or electronic ads. 16 C.F.R. §§ 323.1, 323.3.

#### **DEFENDANT**

14. Defendant Oak Street Manufacturing, LLC, also doing business as Oak Street Bootmakers, is an Illinois limited liability company with its principal place of business at 1431 Hubbard Street, Suite 203, Chicago, IL 60642. Oak Street transacts or has transacted business in this District and throughout the United States. At all times relevant to this Complaint, acting alone or in concert with others, Oak Street has advertised, marketed, distributed, or sold products, including footwear (*e.g.*, boots, loafers, bluchers, oxfords, and moccasins) and footwear accessories, to consumers throughout the United States.

#### **COMMERCE**

15. At all times relevant to this Complaint, Defendant has maintained a substantial course of trade in or affecting commerce, as “commerce” is defined in Section 4 of the FTC Act, 15 U.S.C. § 44.

#### **DEFENDANT’S BUSINESS ACTIVITIES**

16. Defendant advertises, offers for sale, and sells purportedly “handcrafted American” footwear (*e.g.*, boots, loafers, bluchers, oxfords, and moccasins) and footwear accessories to consumers nationwide through the Oak Street website, [www.oakstreetbootmakers.com](http://www.oakstreetbootmakers.com), associated online channels, and physical retail partners.

17. Oak Street’s “Made in USA” and “More than Made in USA” marketing serves as the cornerstone of the Oak Street brand. Specifically, Oak Street has made unqualified U.S. origin

claims on its website, social media accounts, products, and packaging that Oak Street footwear products are “Handcrafted in the USA,” “Made in USA,” and “Handcrafted in America.”

18. Defendant advertises its Oak Street footwear products on Facebook, Instagram, and YouTube. These advertisements on social media include links to Defendant’s websites, which allow consumers to purchase their products.

**Defendant’s “Made in USA” and “More than Made in USA” Advertising Claims**

19. Defendant primarily markets its Oak Street footwear products on the Oak Street website and on social media. On the Oak Street website and in social media advertisements, Defendant has made numerous unqualified “Made in the USA” claims about its Oak Street footwear products.

20. Through at least July 2025, the “Our Story” page on Oak Street’s website boasted that “[s]ince 2010, we have handcrafted 100% of our footwear and accessories in the United States[.]” That same webpage also claimed that “[the Company] make[s] the entire product here [in the U.S.], from heel-to-toe, using no pre-assembled components from overseas.”

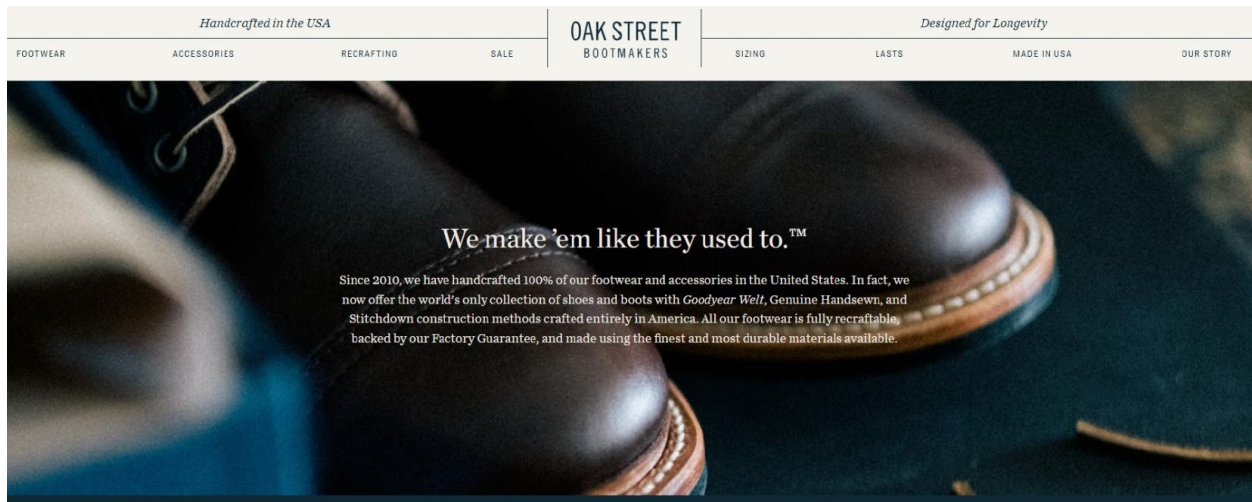


Exhibit A (July 2025, www.oakstreetbootmakers.com)

21. Oak Street’s social media repeated similar unqualified “Made in USA” claims. For example, Defendant’s LinkedIn profile claimed that Oak Street was created to “[p]reserv[e] the tradition of American shoemaking” and that “[a]ll boots and shoes are made in USA ....”

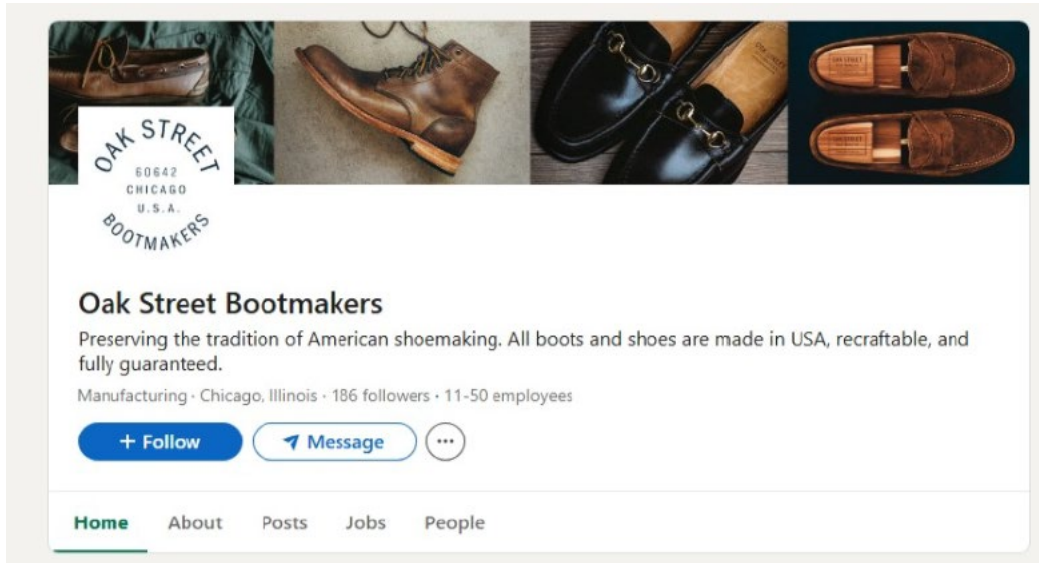


Exhibit B (May 2025, www.Linkedin.com)

22. Additionally, through at least August 2025, Oak Street claimed that its products exceeded the FTC’s Made in USA standard on the Oak Street website. Defendant maintained a webpage on Oak Street’s website titled, “More than Made in USA™[.]” The “More than Made in USA” webpage included an introductory note written by founder George Vlagos explaining that “‘Made in USA’ is ... the whole point” of Oak Street and sharing details about Oak Street’s “commitment to the [American shoemaking] craft.” Defendant bolstered its purported rights to the “More than Made in USA” slogan by adding the trademark symbol (™).<sup>1</sup>

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<sup>1</sup> According to the International Trademark Association, the “TM symbol ... is usually used in connection with an unregistered mark—a term, slogan, logo, or other indicator—to provide notice to potential infringers that rights in the mark are claimed in connection with specific goods or services.” See Fact Sheet: Introduction to Trademarks, Trademark Symbols (Aug. 23, 2023), <https://www.inta.org/fact-sheets/trademark-symbols/>.

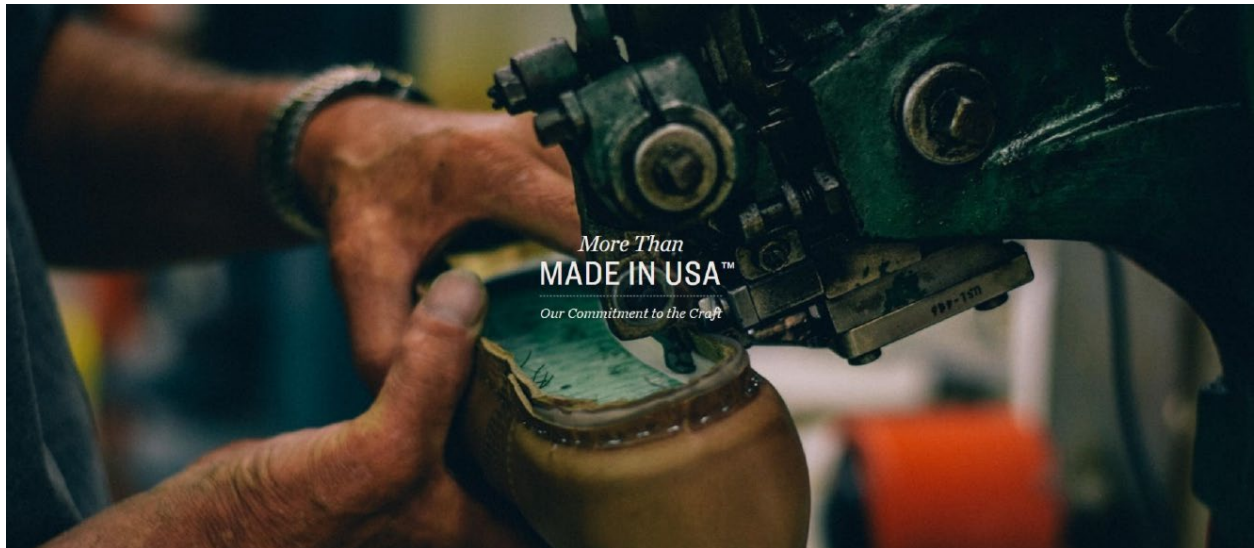









Exhibit C (May 2025, [www.oakstreetbootmakers.com](http://www.oakstreetbootmakers.com))

23. The “More than Made in USA” webpage on Oak Street’s website displayed a chart entitled “KNOW THE DIFFERENCE” that purportedly demonstrated Oak Street’s superior “More than Made in USA” standard for its Oak Street footwear products. For example, the chart asserted that Oak Street “[m]eets the minimum FTC requirements to claim ‘Made in USA,’” “[a]ssembles 100% of shoe or boot in the USA, from heel-to-toe,” “[a]ll components are ... not pre-assembled overseas,” and the “entire product line is made in USA.”

	"MADE IN USA"	<i>More than</i> <b>MADE IN USA</b> <i>by Oak Street Bootmakers</i>
 Meets the minimum FTC requirements to claim "Made in USA"	✓	✓
 Assembles 100% of shoe or boot in the USA, from heel-to-toe	✗	✓
 Acquires all materials domestically or from <i>Preeminent Suppliers</i> <sup>1</sup>	✗	✓
 All components are crafted by hand, not pre-assembled overseas	✗	✓
 Uses domestic sources for boxes, packaging, and printed materials	✗	✓
 Produces all shoe care products and accessories in the USA	✗	✓
 Entire product line is made in USA, not just a few "heritage" styles	✗	✓

<sup>1</sup> *Preeminent Supplier*: We only procure materials from overseas manufacturers with 10 or more years of continuous operation, headquartered in a nation ranked as "Very High" by the United Nations Human Development Index.

Exhibit D (May 2025, [www.oakstreetbootmakers.com](http://www.oakstreetbootmakers.com))

24. However, Oak Street's footwear products failed to meet the FTC's Made in USA standard under Section 5 of the FTC Act and the MUSA Labeling Rule, let alone Defendant's own purportedly "More than Made in USA" standard described above. As discussed in more detail below, thousands of Oak Street footwear products were manufactured or assembled in significant part in the Dominican Republic.

### **Defendant's "Made in USA" and "More than Made in USA" Labeling Claims**

25. In addition to its advertising claims, Defendant labels its footwear as "Made in USA." For example, the sock liner (i.e., the top layer of the inner sole) inside a pair of moccasins is marked, "Handcrafted in the USA."

26. Claims that a product is “Crafted in the USA” or “Handcrafted in the USA” constitute “Made in USA” claims.



Exhibit E (May 2025, [www.oakstreetbootmakers.com](http://www.oakstreetbootmakers.com))

27. Defendant further reinforces these “Made in USA” claims by labeling their packaging—such as shoe boxes and bags—with the phrase “Handcrafted in the USA,” as shown below:



Exhibit F (August 14, 2024, Oak Street Bookmakers Instagram)

**Defendant Has Falsely Marketed, Labeled and Sold  
Its Footwear Products as “Made in USA”**

28. Since at least August 2021, Defendant has advertised, offered for sale, and sold Oak Street footwear products as “Made in USA” and “More than Made in USA” when in fact since at least May 2023, such products have been substantially assembled or manufactured outside of the United States. Indeed, in some cases, Oak Street footwear products have contained significant foreign components, such as outsoles sourced from Brazil.

29. Beginning in May 2023, Defendant contracted with a factory in the Dominican Republic to manufacture the “uppers” for their loafers, moccasins, boat shoes, oxfords, and boots eventually sold to consumers. The “upper” of a shoe consists of the top portion of the shoe that covers the toes, top, sides and back of the heel. Additionally, for those same footwear products,

Defendant purchased outsoles from a factory in Brazil. The outsole is the bottom portion of the shoe that makes contact with the ground.

30. Defendant then imported uppers sourced from the Dominican Republic and outsoles sourced from Brazil to one of Oak Street's U.S.-based contract manufacturers for the final assembly stage where the outsole is attached to the upper or "bottomed."

31. In addition, at certain times, Defendant also contracted with a factory in the Dominican Republic to complete the "bottoming" services for Oak Street footwear products.

32. Defendant received the finished versions of the Oak Street footwear products for non-manufacturing tasks, such as inspection and touch-ups.

33. Defendant then packaged the Oak Street footwear products described above—which were not "all or virtually all" made in the United States—into boxes and bags labeled as "Made in the USA" or with a similar domestic origin claim.

34. Defendant advertised and sold the Oak Street footwear products to consumers, without disclosing that they were significantly processed, manufactured, or assembled overseas.

#### **VIOLATIONS OF THE FTC ACT**

35. Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), prohibits "unfair or deceptive acts or practices in or affecting commerce."

36. Misrepresentations or deceptive omissions of material fact constitute deceptive acts or practices prohibited by Section 5(a) of the FTC Act.

#### **Count I: Section 5(a) Violation**

37. In numerous instances in connection with the advertising, marketing, promotion, offering for sale, or sale of footwear products (*e.g.*, boots, loafers, bluchers, oxfords, and moccasins), Defendant has represented, directly or indirectly, expressly or by implication, that its

products: (a) are all or virtually all made in the United States; and (b) meet the minimum FTC requirements to claim “Made in USA.”

38. Defendant’s representations as set forth in paragraph 37 are false or misleading. In truth and in fact, in numerous instances in which Defendant has made the representations set forth in paragraph 37, Defendant’s products were not all or virtually all made in the United States because they were substantially manufactured in another country. For thousands of Defendant’s products, a significant portion of the manufacturing process occurred in the Dominican Republic, not the United States.

39. Whether Defendant’s footwear products (*e.g.*, boots, loafers, bluchers, oxfords, and moccasins) were made all or virtually all in the United States is material to consumers when deciding whether to purchase these products.

40. Therefore, Defendant’s representations constitute a deceptive act or practice in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

#### **VIOLATIONS OF SECTION 45a**

41. Section 45a, 15 U.S.C. § 45a, states that “To the extent any person introduces, delivers for introduction, sells, advertises, or offers for sale in commerce a product with a ‘Made in the U.S.A.’ or ‘Made in America’ label, or the equivalent thereof, in order to represent that such product was in whole or substantial part of domestic origin, such label shall be consistent with decisions and orders of the Federal Trade Commission issued pursuant to section 45 of [Title 15, *i.e.*, 15 U.S.C. § 45].”

42. The decisions and orders of the FTC issued pursuant to 15 U.S.C. § 45 provide that “Made in the United States” means any representation, express or implied, that a product or service, or a specified component thereof, is of U.S. origin, including, but not limited to, a representation that such product or service is “made,” “manufactured,” “built,” “produced,” or

“crafted” in the United States or in America, or any other U.S.-origin claim. Further, those decisions and orders provide that in connection with the manufacturing, labeling, advertising, promotion, offering for sale, sale, or distribution of any product or service, a seller must not make any representation, expressly or by implication, that their product is Made in the United States unless:

a. The final assembly or processing of the product occurs in the United States, all significant processing that goes into the product occurs in the United States, and all or virtually all ingredients or components of the product are made and sourced in the United States; or

b. A clear and conspicuous qualification appears immediately adjacent to the representation that accurately conveys the extent to which the product contains foreign parts, ingredients or components, and/or processing; or

c. For a claim that a product is assembled in the United States, the product is last substantially transformed in the United States, the product’s principal assembly takes place in the United States, and United States assembly operations are substantial.

43. Recent decisions and orders including the definition in paragraph 42, *supra*, include *In the Matter of ExotoUSA LLC*, FTC Docket No. C 4800, Decision and Order at 3-4 (Jan. 10, 2024); *In the Matter of Chaucer Accessories, Inc.*, FTC Docket No. C-4797, Decision and Order at 4 (Aug. 22, 2023); *In the Matter of Cycra Inc.*, FTC Docket No. C-4794, Decision and Order at 3-4 (May 30, 2023); *In the Matter of Instant Brands LLC*, FTC Docket No. C-4788, Decision and Order at 3 (March 1, 2023); *In the Matter of Electrowarmth Products, LLC*, FTC Docket No. C-4779, Decision and Order at 3-4 (Oct. 25, 2022); *In the Matter of Lions Not Sheep Apparel, LLC*, FTC Docket No. C- 4772, Decision and Order at 4 (July 28, 2022); *In the Matter of Resident Home LLC*, FTC Docket No. C-4767, Decision and Order at 3-4 (June 21, 2022); *In the Matter of Gennex Media LLC*, FTC Docket No. C-4741, Decision and Order at 4 (Apr. 9,

2021); *In the Matter of Chemence, Inc.*, FTC Docket No. C-4738, Decision and Order at 3-4 (Feb. 9, 2021); *In the Matter of Williams-Sonoma, Inc.*, FTC Docket No. C-4724, Decision and Order at 3 (July 13, 2020); *In the Matter of Sandpiper of California, Inc.*, FTC Docket No. C-4675, Decision and Order at 3 (Apr. 16, 2019); *In the Matter of Underground Sports Inc.*, FTC Docket No. C-4674, Decision and Order at 4 (Apr. 16, 2019); *In the Matter of Nectar Brand LLC*, FTC Docket No. C-4656, Decision and Order at 3 (Aug. 28, 2018); *see also FTC v. Cardiff*, 5:18-cv-02104, Dkt. 706, Final Order at 19 (C.D. Cal. Mar. 1, 2022).

### **Count II: Section 45a Violation**

44. In numerous instances Defendant has introduced, delivered for introduction, sold, advertised, or offered for sale footwear products (*e.g.*, boots, loafers, bluchers, oxfords, and moccasins) with “Made in the U.S.A.” or “Handcrafted in the USA” labels, or the equivalents thereof, in order to represent that such products were in whole, virtually all, or substantial part of domestic origin.

45. In truth and in fact, in numerous instances in which Defendant has taken the actions and made the representations set forth in paragraph 44, Defendant’s products were not in whole, virtually all, or substantial part of domestic origin because they were significantly processed in another country, and thus, were also not consistent with decisions and orders of the Federal Trade Commission.

46. Therefore, Defendant’s representations as set forth in paragraph 44 violate Section 45a, 15 U.S.C. § 45a.

### **VIOLATIONS OF THE MADE IN USA LABELING RULE**

47. Effective August 13, 2021, the Made in USA Labeling Rule, 16 C.F.R. Part 323 (“MUSA Labeling Rule”), prohibits marketers from labeling products as “Made in the United States” unless: (1) “the final assembly or processing of the product occurs in the United States;”

(2) “all significant processing that goes into the product occurs in the United States;” and (3) “all or virtually all ingredients or components of the product are made and sourced in the United States.” 16 C.F.R. § 323.2.

48. The MUSA Labeling Rule also provides, to the extent any mail order catalog or mail order promotional material includes a seal, mark, tag, or stamp labeling a product “Made in the United States,” such label must comply with the requirements of 16 C.F.R. § 323.2. *See* 16 C.F.R. § 323.3.

49. For purposes of the MUSA Labeling Rule, a “mail order catalog” and “mail order promotional material” are defined to include materials “disseminated in print or by electronic means, and that solicit the purchase of such product or service by mail, telephone, electronic mail, or some other method without examining the actual product purchased.” 16 C.F.R. § 323.1(b).

50. For purposes of the MUSA Labeling Rule, “Made in the United States” is defined as “any unqualified representation, express or implied, that a product or service, or a specified component thereof, is of U.S. origin, including, but not limited to, a representation that such product or service is ‘made,’ ‘manufactured,’ ‘built,’ ‘produced,’ ‘created,’ or ‘crafted’ in the United States or in America, or any other unqualified U.S.-origin claim.” 16 C.F.R. § 323.1(a).

51. A violation of the MUSA Labeling Rule constitutes an unfair or deceptive act or practice in violation of Section 5(a) of the Federal Trade Commission Act, 15 U.S.C. § 45(a). *See* 15 U.S.C. § 57a(d)(3) and 16 C.F.R. § 323.4.

### **Count III: MUSA Labeling Rule Violations**

52. Since at least August 2021, Defendant has placed seals, marks, tags, or stamps making unqualified Made in the United States claims on footwear products and on mail order promotional material for products that were significantly processed in the Dominican Republic.

53. Defendant placed seals, marks, tags, or stamps making unqualified Made in the United States claims in electronic used in the direct sale or direct offering for sale of products to consumers by mail, telephone, electronic mail, or some other method without examining the actual product purchased.

54. Defendant applied the labels described in paragraphs 52-53 to products and marketing material for products for which not “all significant processing,” occurred in the United States. *See* 16 C.F.R. § 323.2.

55. Therefore, Defendant’s acts or practices as alleged in paragraphs 52-54 violate the MUSA Labeling Rule, 16 C.F.R. §§ 323.2, 323.3, and constitute unfair or deceptive acts or practices in violation of Section 5 of the FTC Act, 15 U.S.C. § 45(a).

#### **CONSUMER INJURY**

56. Consumers are suffering, have suffered, and will continue to suffer substantial injury as a result of Defendant’s violations of the FTC Act, Section 45a, and the MUSA Labeling Rule. Absent injunctive relief by this Court, Defendant is likely to continue to injure consumers and harm the public interest.

**PRAYER FOR RELIEF**

Wherefore, the FTC requests that the Court:

- A. Enter a permanent injunction to prevent future violations of the FTC Act, Section 45a, and the MUSA Labeling Rule;
- B. Award monetary and other relief within the Court's power to grant; and
- C. Award any additional relief as the Court determines just and proper.

Respectfully submitted,

Dated: 4/14/2026

*/s/ Adrienne M. Jenkins*

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