



UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
600 PENNSYLVANIA AVENUE, NW
WASHINGTON, DC 20580

Division of Enforcement
Bureau of Consumer Protection

September 6, 2012

FEDERAL EXPRESS

Mr. Gerardo Anaya
President
G&A Investments, Inc.
2615 Fruitland Avenue
Vernon, California 90058

Dear Mr. Anaya:

The staff of the Federal Trade Commission has received your submissions of July 9, 2012 and July 31, 2012 on behalf of G&A Investments, Inc. ("G&A"). In our correspondence and discussions, you indicated that some of G&A's gun cleaning patches are made with imported material and therefore have more than *de minimis* foreign content. You also stated, however, that G&A based its unqualified "Made in USA" claims for these products upon the fact that G&A converts these materials into gun patches in its U.S. manufacturing plant. In light of guidance provided by Commission staff, however, you now indicate that G&A no longer makes unqualified "Made in USA" claims for products that are not all or virtually all made in the United States.

Based on your statements, 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 ("FTC 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, I can be reached at (202) 326-2890.

Sincerely,


Laura Koss
Staff Attorney