



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

Division of Enforcement  
Bureau of Consumer Protection

August 23, 2010

**FEDERAL EXPRESS**

Daniel T. Rockey  
Bullivant Houser Bailey  
601 California Street  
Suite 1800  
San Francisco, California 94108-2823

Dear Mr. Rockey:

The staff of the Federal Trade Commission ("FTC") has received your submission of July 30, 2010 on behalf of Ritter Chemical, LLC ("Ritter"). In your letter, you assert that, starting in late February or March of 2010, Ritter advertised its Alecto herbicide product as "Made in USA" on its website and on stickers for approximately 5,000 Alecto product containers. According to your letter, the company removed the "Made in USA" statement from its website and halted the placement of "Made in USA" stickers on products upon being contacted by FTC staff in July 2010. You also state that Ritter has cautioned each of its distributors against making misrepresentations concerning the manufacturing process or origin of Alecto products.

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,

A handwritten signature in black ink, appearing to read "Laura Koss", with a long horizontal line extending to the right.

Laura Koss  
Staff Attorney