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



Bureau of Consumer Protection Division of Enforcement

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November 19, 2013

FEDERAL EXPRESS

Jon Blatchford Chief Executive Officer J.K. Adams Company 1430 Route 30 Dorset, Vermont 05251

Dear Mr. Blatchford:

We received your submissions dated September 16, 2013, October 31, 2013, November 5, 2013, and November 18, 2013, on behalf of J.K. Adams Company ("J.K. Adams" or the "Company"). In correspondence and discussions, you explained that J.K. Adams mistakenly promoted certain products as "Made in the United States" although those products contained foreign components. Specifically, though the Company makes many products in the United States from U.S.-sourced hardwoods, others contain Canadian content or imported hardware.

After receiving Commission staff's letter, you explained that J.K. Adams implemented a remedial action plan to correct its representations. This plan included: (1) removing "USA Made" brands from products containing imported hardware or Canadian content; (2) updating J.K. Adams's marketing materials and website; (3) correcting product packaging; (4) contacting independent sales representatives to clarify that some products contain imported content; and (5) planning an updated website and associated marketing materials for rollout mid-2014.

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, 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.

Julia Solomon Ensor

Staff Attorney