



December 21, 2017

**VIA OVERNIGHT MAIL AND EMAIL**

Deborah P. Majoras  
Chief Legal Officer  
Procter & Gamble  
One Procter & Gamble Plaza  
Cincinnati, Ohio 45202  
[REDACTED]

Re: Gillette's False and Deceptive Made in USA Marketing Campaign

Dear Ms. Majoras:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from false and deceptive advertising. We have found that Procter & Gamble-owned Gillette is engaged in a misleading marketing campaign.

Specifically, Gillette is running a national advertising campaign – focused on its Boston factory and the people who work there – that makes the unqualified claim that its products are made in the United States. Such claims (both express and implied) are made in national television commercials, on Gillette's website, and on its social media platforms. However, the overwhelming majority of Gillette products (as represented on its website) that include origin information on their packaging do not meet the legal definition for a "Made in the USA" claim. Despite this fact, Gillette fails to inform consumers in its marketing that many of its products (or components therein) are not wholly made in the U.S. As such, Gillette is misleading consumers.

As you may already be aware, TINA.org reached out to Gillette in November 2017 for comment in connection with one part of Gillette's Boston-centric campaign – its 30-second national television commercial that highlights its Boston factory and includes various images of an American flag (yet features three Gillette products that are at least partially made overseas).<sup>1</sup> In response, a Gillette spokesperson told TINA.org, in relevant part:

[L]et me clarify that the commercial you are referencing is not making a "Made in the USA" claim – what you see in the spot is a tribute to our longstanding heritage

of manufacturing in Boston and the more than 1,000 men and women who work here today to make some of our best blades. The campaign does not claim exclusive manufacturing of Gillette products in the US.<sup>2</sup>

However, according to the FTC:

In identifying implied claims, the Commission focuses on the overall impression of the advertising, or promotional material. Depending on the context, U.S. symbols or geographic references (for example, U.S. flags, outlines of U.S. maps, or references to U.S. locations of headquarters or factories) may convey a claim of U.S. origin either by themselves, or in conjunction with other phrases or images.

**Example:** A company promotes its product in an ad that features a manager describing the “true American quality” of the work produced at the company’s American factory. Although there is no express representation that the company’s product is made in the U.S., the overall – or net – impression the ad is likely to convey to consumers is that the product is of U.S. origin.<sup>3</sup>

Accordingly, we intend to notify the FTC that Gillette is deceptively marketing its products, unless, by December 29, 2015, you show us that Gillette has fully corrected the issues described above across all of its marketing materials and that the company has made every effort to alert its customers of these issues. If you have any questions, please do not hesitate to contact me directly.

Sincerely,



Laura Smith, Esq.  
Legal Director  
Truth in Advertising, Inc.

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<sup>1</sup> See Gillette’s Implied Made in the USA Claims, dated Nov. 15, 2017, available at <https://www.truthinadvertising.org/gillettes-implicit-made-usa-claims/>.

<sup>2</sup> *Id.*

<sup>3</sup> See Federal Trade Commission: Complying with the Made in USA Standard, <https://www.ftc.gov/tips-advice/business-center/guidance/complying-made-usa-standard>.