



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

Bureau of Consumer Protection
Division of Enforcement

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April 19, 2018

VIA FEDEX

Albert P. Mauro, Jr., Esq.
Assistant General Counsel
Hallmark Cards, Incorporated
2501 McGee Trafficway #339
Kansas City, MO 64141

Dear Mr. Mauro:

We received your submissions on behalf of Hallmark Cards, Incorporated (“Hallmark” or the “Company”). During our review, we discussed specific concerns relating to potentially deceptive “Made in USA” claims on the hallmark.com website for apparently imported holiday puzzles, as well as general concerns relating to Hallmark’s process for ensuring the accuracy of country-of-origin claims on the Company’s website.

In response to our inquiry, Hallmark took several steps to prevent consumer deception. First, Hallmark confirmed and corrected the country-of-origin information for the identified puzzles. You noted that although the Company imported holiday puzzles for the 2017 season and has corrected claims on affected hallmark.com listings, these puzzles are no longer available for sale to consumers. For the 2018 season, Hallmark intends to sell holiday puzzles that are “all or virtually all” made in the United States.

Second, the Company reviewed its website to confirm that all SKUs with product descriptions containing U.S.-origin claims – including other puzzles, cards, soaps, candles, food products, and third-party products – make claims consistent with the FTC’s Enforcement Policy Statement on U.S.-Origin Claims. In conjunction with this review, Hallmark also: (1) updated its procedures to ensure that any time a product’s country of origin changes, any U.S.-origin claim will be removed from hallmark.com; (2) instituted new validation requirements for U.S.-origin claims on the site; and (3) introduced mandatory escalation of any consumer complaints relating to potentially inaccurate country-of-origin claims.

Based on Hallmark’s actions and other factors, 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,

A handwritten signature in blue ink, appearing to read "J. ENSOR". The signature is stylized with loops and a long horizontal stroke at the end.

Julia Solomon Ensor
Staff Attorney