



June 30, 2025

VIA EMAIL

Chris Mufarrige, Director
Brian Berggren, Acting Associate Director, Division of Enforcement
Bureau of Consumer Protection
Federal Trade Commission
600 Pennsylvania Ave. N.W.
Washington, D.C. 20580
cmufarrige@ftc.gov
bberggren@ftc.gov

Re: Renewal by Andersen's Deceptive Made in USA Marketing

Dear Mr. Mufarrige and Mr. Berggren:

A Truth in Advertising, Inc. ("TINA.org") investigation into Andersen Corporation's Renewal by Andersen ("Renewal") has revealed that Renewal is labeling and marketing its products as made in the United States in violation of the FTC's Made in USA Labeling Rule, 16 CFR Part 323¹ and Section 5 of the FTC Act, 15 U.S.C. § 45.²

Specifically, Renewal advertises its products – with labels and seals, as well as other marketing materials – as "custom built" and "made" in the United States.³




Sponsored

 **Renewal by Andersen® -**
Proudly Made In The US

<https://offers.renewalbyandersen.com> › win...

Give Your Windows & Doors the Upgrade
They've Been Needing With This Limited Time
Offer. Schedule a Free Design Consultation ...

**Custom-Built in
the U.S.A.***

 **Proudly built to order in the state of Minnesota.
Avoid import costs – just quality windows made
for your home.**

The reality, however, is that Renewal products contain imported parts, a fact that is relegated to inconspicuous fine print, if disclosed at all.

Such deceptive labeling and marketing not only harms consumers seeking American-made products, but honest companies trying to compete with one of the country’s largest manufacturers of windows and doors.⁴

Company Background

Renewal is a subsidiary of multibillion-dollar company Andersen Corporation.⁵ It has seven company-owned locations, and is known for its door-to-door sales tactics⁶ using more than 100 independently owned “affiliates” across the United States.⁷ Renewal regularly runs national television commercials and has spent more than \$400 million on advertising since January 2023.⁸

The company has a history of deceptive marketing and regulatory trouble. For example, in 2014, the New York City Department of Consumer Affairs determined that Renewal was making unsubstantiated claims about the efficiency of its windows, in violation of New York City laws.⁹ In 2019, the company reached a settlement with the Office of the Attorney General for the District of Columbia for alleged discriminatory practices and civil rights violations.¹⁰ And in 2023, the United States Environmental Protection Agency filed an enforcement action against Renewal for violating the agency’s lead-based paint laws that resulted in the company being ordered to pay a civil penalty.¹¹

In addition to regulatory enforcement actions, Renewal has also faced a plethora of private lawsuits and arbitrations for a multitude of issues, including allegedly engaging in anticompetitive conduct by forcing certain retailers to exclusively sell its windows and doors¹² (resulting in Renewal being ordered to pay \$7 million in 2022¹³) to falsely advertising discounts off of artificially inflated reference prices¹⁴ to sending unsolicited and misleading commercial emails that violate state laws.¹⁵

Deceptive Made in USA Labeling & Marketing

Labeling products as Made in the USA is an incredibly popular and effective marketing tool. In fact, numerous surveys have consistently found that a majority of U.S. consumers seek out American-made products and are even willing to pay more for them.¹⁶ And as tariffs drive up the cost of imported goods, Made in USA products are now in even higher demand,¹⁷ a fact that Renewal seems keenly aware of.¹⁸

Capitalizing on this profitable marketing tactic, Renewal is – and has been for years¹⁹ – labeling and marketing its windows and doors as made in the United States. For example, in digital and print brochures,²⁰ Renewal displays a large red, white and blue label that claims its products are “Custom Built in the USA.” As far away as possible, at the very bottom of the page, in miniscule 6-point font,²¹ the company attempts to qualify its claim admitting that it is “*Using U.S. and Imported Parts.”²²



Double-Hung Windows / White Exterior

Customer Service



Our professional sales consultants and expert installation teams are with you every step of the way.

Products



Innovative products and features are available throughout our product line.

Professional Installation



**CERTIFIED
MASTER
INSTALLER**

Our installers are experienced and understand the many critical steps involved with installing your new windows and doors properly.

Nation's Best Warranty



We offer one of the strongest limited warranties of any window and door manufacturer, and it is fully transferable should you sell your home.¹

¹ See Renewal by Andersen® Products and Installation Transferable Limited Warranty for details. It is the only warranty among top selling window companies that meets all of the following requirements: easy to understand terms, unrestricted transferability, installation coverage, labor coverage, geographically unrestricted, coverage for exterior color, insect screens and hardware, and no maintenance requirement. Visit renewalbyandersen.com/nationsbest for details.

² Using U.S. and imported parts.

The prominent USA seal also appears in Renewal television commercials. In some commercials, there is no mention of imported parts, while in others, unreadable fine print disclosing the use of imported parts appears on the screen for mere seconds, while a voiceover boasts of the company's domestic manufacturing. Below are examples:

Television commercial with no mention of imported parts²³



Television commercial with inconspicuous fine print disclosing imported parts²⁴



Voiceover: *"Each of our windows and doors are custom built right here in the USA. Skilled American workers craft every frame, every pane, every detail. So whether you're upgrading your windows or transforming your patio or entryway, you're investing in American craftsmanship. Built for your home. Built to last. Custom built in the USA."*

The seal also appears in the company's YouTube videos, including one called "Renewal by Andersen: Custom Built in the U.S.A.," which has garnered more than 6,000 views since it first aired in 2018.²⁵ In the video, Renewal touts its domestic manufacturing while featuring its Custom Built in the USA seal. Inconspicuous fine print disclosing the company's use of imported parts appears in the bottom corner of the screen in faint, small, white font²⁶ while the narrative makes clear that Renewal is made in the USA.

July 19, 2018 YouTube Video



Voiceover: *“What do you think of when you hear ‘Custom Built in the USA’? Superior quality? Skilled craftsmanship? Built to last? At Renewal by Andersen, our windows are custom built in the USA. That’s something each and every one of us is proud of. We’re proud of what we do and we’re proud of where we do it. ... We’re able to bring beautiful windows custom built in the USA right to your home. It’s an honor and a responsibility we take seriously because we truly believe it’s what you deserve. At the end of each day, we’re most proud when we’re able to say our windows, this window, your window, all these windows, are custom built right here in Cottage Grove, Minnesota in these United States of America.”*

The company’s websites also features its USA seal, as do promotional flyers mailed to consumers’ homes.²⁷

Renewal by Andersen websites²⁸



We tried to reach you

Please call our Help Line at **860-452-6667**
to schedule your FREE Window and Door
Diagnosis and receive an exact price quote.

*Renewal by Andersen
is turning 30! To
celebrate, we're offering
a fantastic promotion
that you won't want
to miss:*

*\$1,995 OFF windows'
\$1,995 OFF patio doors'
\$1,995 OFF an entry
door system'*

*Call or scan below today
860-452-6667*

Please respond by:

→ 6/30



**RENEWAL
by ANDERSEN**

FULL-SERVICE WINDOW & DOOR REPLACEMENT

Superior Products. Exceptional Service.™



MADE IN U.S. AND
IMPORTED PARTS

**SINCE
1995**

Scan to
self-schedule
your
appointment



Advertise with *Finer Living Magazine* 888-287-9451


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In short, Renewal’s made in USA labels and seals featured in brochures, television commercials, social media posts, magazines, flyers and on its website, among other places, prominently feature the patriotic red, white, and blue “USA” design while qualifying language (*if* it appears at all) is generally far below it (though the distance from the origin claim varies) and always in miniscule fine print, meaning reasonable consumers are likely to miss it.²⁹

Further amplifying this deception is Renewal’s use of Google ads, social media posts and mailers, among other things, that make unqualified Made in USA claims, as exemplified below.

June 17, 2025 Google Ad³⁰

Sponsored


offers.renewalbyandersen.com
<https://offers.renewalbyandersen.com> › savings-on-new › windows-&-doors ›

Proudly Made In The US

Sale Ends June 30th — Save \$1995 on Windows, Patio Doors, and Entry Door Systems! Take the Quiz to Claim Offer!

“Proudly Made In The US”

May 26, 2025 Facebook post³¹


Renewal by Andersen
May 26 at 9:17 AM ·

Today, we pause to remember the heroes who made the ultimate sacrifice. Their courage lives on—in our homes, our hearts, and our freedom.

Crafted with care. Built to last. Custom-built in America.

[#MemorialDay](#) [#BuiltInUSA](#) [#RenewalByAndersen](#)





15

1 comment
1 share

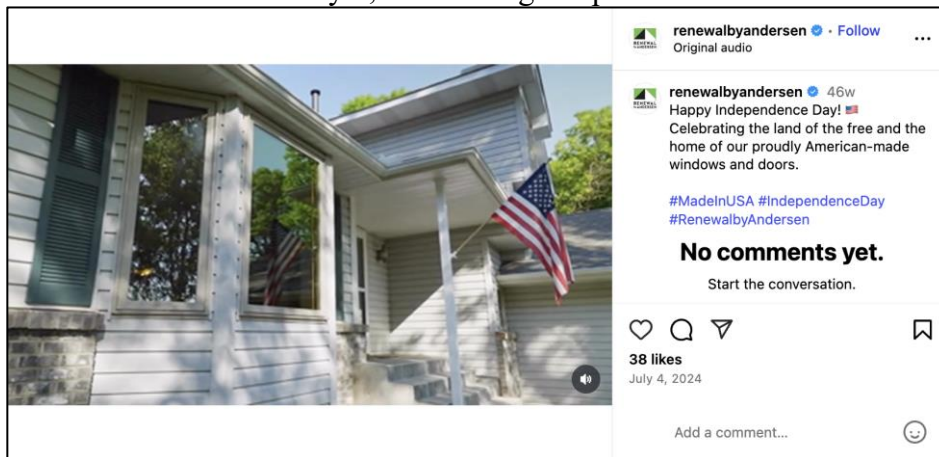
 Like

 Comment

 Share

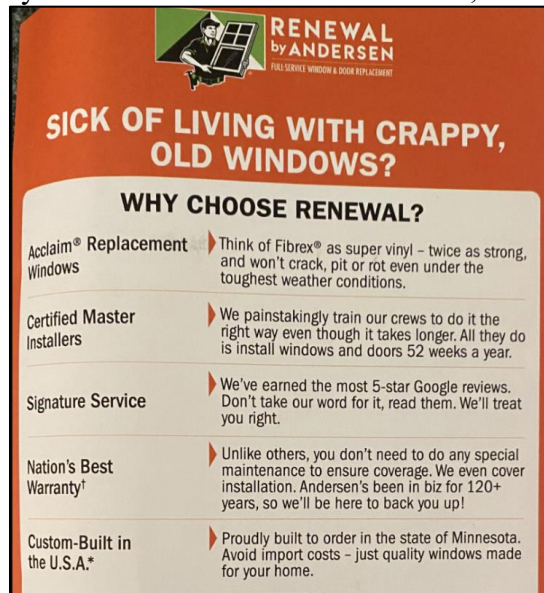
“Custom-built in America. ... #BuiltInUSA”

July 4, 2024 Instagram post³²



“Celebrating the land of the free and the home of our proudly American-made windows and doors. #MadeInUSA...”

Flyer received in the mail on June 14, 2025³³



*“Custom-Built in the U.S.A. * ... Proudly built to order in the state of Minnesota. Avoid import costs – just quality windows made for your home.”³⁴*

TINA.org has collected more than 80 examples of Renewal’s deceptive marketing materials promoting products as made in the United States. These examples are all available at www.truthinadvertising.org/evidence/renewal-by-andersen-made-in-usa-database/.

Conclusion

Renewal has every right to boast of its assembly work in the United States that creates American jobs and strengthens the U.S. economy, but it cannot illegally embellish the amount of manufacturing that takes place domestically.

The FTC has a powerful and efficient tool it can use to put an end to Renewal's deceptive made in USA labeling and effectively protect consumers and honest businesses from the company's long-running deceptive made in USA marketing. TINA.org urges the Commission to open an investigation into Renewal by Andersen and take appropriate enforcement action.

Sincerely,



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



Bonnie Patten, Esq.
Executive Director
Truth in Advertising, Inc.

Cc via email: John Arnason, General Counsel, Renewal by Andersen

¹ The FTC's Made in USA Labeling Rule prohibits Renewal from labeling:

any product as Made in the United States unless the final assembly or processing of the product occurs in the United States, all significant processing that goes into the product occurs in the United States, and all or virtually all ingredients or components of the product are made and sourced in the United States.

FTC's Made in USA Labeling Rule, 16 CFR Part 323. This prohibition applies to both print and electronic labels, seals, marks, tags or stamps in mail order catalogs and promotional materials that identify products as made, manufactured, built, produced, created or crafted in the United States. *Id.*

² Section 5 of the FTC Act, as explained in the FTC's Enforcement Policy Statement on U.S. Origin Claims, requires that for a product to qualify as Made in the USA, it must be all or virtually all made in the United States. "In other words, where a product is labeled or otherwise advertised with an unqualified 'Made in USA' claim, it should contain only a de minimis, or negligible, amount of foreign content." Fed. Trade Comm'n, Enforcement Policy Statement on U.S. Origin Claims (1997), <https://www.ftc.gov/legal-library/browse/enforcement-policy-statement-us-origin-claims>.

³ See, e.g., Renewal by Andersen, *Renewal by Andersen: Custom Built in the U.S.A.*, YouTube (July 19, 2018), <https://www.youtube.com/watch?v=SB0UIbRqf7w>; June 2025 Google ad, available at https://truthinadvertising.org/wp-content/uploads/2025/06/RenewalbyAndersen_GoogleAd_D.jpg; Renewal by Andersen flyer received in the mail on June 14, 2025, https://truthinadvertising.org/wp-content/uploads/2025/06/RenewalbyAndersen_mailflyer_recieved_6_14_25_Front.png; https://truthinadvertising.org/wp-content/uploads/2025/06/RenewalbyAndersen_mailflyer_recieved_6_14_25_Back.png.

⁴ For purposes of this investigation, TINA.org focused exclusively on Renewal’s made in USA marketing. However, other problematic marketing issues may exist as well with Renewal, including but not limited to, possible issues pertaining to claims regarding the company’s warranty coverage, pricing and promotions, and energy efficiency.

⁵ Andersen Windows & Doors: Our Story, <https://www.andersenwindows.com/about/our-story/>; Andrea Murphy, *Top Private Companies*, Forbes (Nov. 25, 2024), <https://www.forbes.com/lists/top-private-companies/#tab:rank>.

⁶ Indeed’s Renewal by Andersen Reviews, <https://www.indeed.com/cmp/Renewal-By-Andersen/reviews/door-to-door-sales?id=f2f372fcf1763969>.

⁷ Esler Companies’ Renewal By Andersen, <https://esler.com/about/who-we-are/>.

⁸ According to Statista, Renewal spent \$222.56 million on advertising in 2023. *See* Largest Foundation, Structure, and Building Exterior Contractor Advertisers in the United States in 2023, by Ad Spend (Nov. 2024), <https://www.statista.com/statistics/1538864/leading-foundation-structure-and-building-exterior-contractors-ad-spend-us/>. And according to data obtained from Media Radar, the company has spent \$213,703,597 on advertising since 2024. *See also* Renewal By Andersen Advertising Spending in the United States in 2023, by Medium (Nov. 2024), <https://www.statista.com/statistics/1538768/renewal-by-andersen-medium-ad-spend-us/#:~:text=Renewal%20By%20Andersen%20ad%20spend%20in%20the%20U.S.%202023%2C%20by%20medium&text=In%202023%2C%20the%20ad%20spending,of%20131.61%20million%20U.S.%20dollars>.

⁹ Press Release, N.Y.C. Consumer and Worker Prot., Department of Consumer Affairs Warns New Yorkers about Advertising by Home Improvement Contractors that claim Energy Savings (May 12, 2015), <https://www.nyc.gov/site/dca/news/017-15/departement-consumer-affairs-warns-new-yorkers-advertising-home-improvement-contractors>.

¹⁰ Press Release, Off. of the Att’y Gen. for D.C., AG Racine Announces Major Window Company to Stop Discriminating Against Consumers East of the Anacostia River (Aug. 21, 2019), <https://oag.dc.gov/release/ag-racine-announces-major-window-company-stop>.

¹¹ Consent Agreement and Final Order, *In the Matter of: Renewal by Andersen, LLC Middleburg Heights, Ohio*, No. TSCA-05-2024-0004 (EPA Oct. 11, 2023), [https://yosemite.epa.gov/OA/rhc/EPAAdmin.nsf/Filings/5C63F3C99791D58185258A4500690FC6/\\$File/TSCA-05-2024-0004_CAF0_RenewalByAndersonLLC_MiddleburgHeightsOhio_15PGS.pdf](https://yosemite.epa.gov/OA/rhc/EPAAdmin.nsf/Filings/5C63F3C99791D58185258A4500690FC6/$File/TSCA-05-2024-0004_CAF0_RenewalByAndersonLLC_MiddleburgHeightsOhio_15PGS.pdf); Enforcement Alert: EPA Enforces Lead Renovation, Repair, and Paint Regulations Against Violators, <https://www.epa.gov/enforcement/enforcement-alert-epa-enforces-lead-renovation-repair-and-paint-regulations-against>.

¹² Verified Complaint Violation of the Sherman Act, Clayton Act, and for Antitrust and Unfair Competition; Wrongful Termination; Breach of Contract; Fraud, *Dreamstyle Remodeling, Inc. v. Renewal By Andersen*, No. 1:19-cv-01086, D.N.M.), <https://www.krqe.com/wp-content/uploads/sites/12/2019/11/Dreamstyle-lawsuit-Completely-Rotated.pdf>.

¹³ Memorandum Opinion and Order, *Dreamstyle Remodeling, Inc. v. Renewal By Andersen, LLC*, No. 22-cv-127 (D.N.M. Jan. 18, 2023),

<https://storage.courtlistener.com/recap/gov.uscourts.nmd.470909/gov.uscourts.nmd.470909.30.0.pdf>.

¹⁴ Class-Action Tracker: Renewal By Andersen’s Discounts, <https://truthinadvertising.org/class-action/renewal-by-andersens-discounts/>; Class Action Complaint, *Young v. Renewal by Andersen*, No. 24CV009935 (Cal. Super. Ct. May 20, 2024), <https://truthinadvertising.org/wp-content/uploads/2025/05/Young-v-Renewal-by-Andersen-complaint.pdf>.

¹⁵ Complaint for Damages and Injunctive Relief, *Hodgell v. Andersen and Renewal by Andersen, LLC*, No. 23-2-05382-6 (Wash. Super. Ct. Mar. 24, 2023).

¹⁶ 2025 DuraPlas Made in America Survey, <https://duraplasinc.com/blog/tariffs-arent-forcing-americans-to-adjust-shopping-habits-yet>; Jason McMann, *Made in America Report, 2023 Edition*, Morning Consult Pro, <https://pro.morningconsult.com/analyst-reports/made-in-america-reshoring-consumer-goods>; Cathalijne Adams, *How Do Americans Feel About Made in America in 2023?*, All. for Am. Mfg. (July 5, 2023), <https://www.americanmanufacturing.org/blog/how-do-americans-feel-about-made-in-america-in-2023/>; Andrew Adam Newman, *Consumers Will Pay More for American-Made Products, But Inflation Takes a Toll: Poll*, Retail Brew (July 28, 2022), <https://www.retailbrew.com/stories/2022/07/28/consumers-will-pay-more-for-american-made-products-but-inflation-takes-a-toll-poll>; Reshoring Institute, *Survey Says: Americans Prefer ‘Made in USA,’* <https://reshoringinstitute.org/wp-content/uploads/2020/09/made-in-usa-survey.pdf>; Press Release, Bos. Consulting Grp., U.S. and Chinese Consumers Willing to Pay More for Made in USA (Nov. 15, 2012), <https://truthinadvertising.org/wp-content/uploads/2015/07/BCG-Press-Release-U...or-Made-in-USA-Products.pdf>; *Knowing Which Products are Truly Made in America: How to Know Which Flag-Waving Products Are True Red, White, and Blue*, Consumer Reports (February 2013), <https://www.consumerreports.org/cro/magazine/2013/02/made-in-america/index.htm>.

¹⁷ Allison Smith, *‘Made in USA’ is Trending on Amazon, and Sellers are Leaning In* (May 8, 2025), <https://digiday.com/marketing/made-in-usa-is-trending-on-amazon-and-sellers-are-leaning-in/>.

¹⁸ See *infra* notes 33-34.

¹⁹ See, e.g., Renewal by Andersen, *Renewal by Andersen: Custom Built in the U.S.A.*, YouTube (July 19, 2018), <https://www.youtube.com/watch?v=SB0UIbRqf7w>; Renewal by Andersen, *It’s More Than Just Replacement Windows*, YouTube (Nov. 22, 2017), https://www.youtube.com/watch?v=B9-BUxmbm_Q.

²⁰ Consumers can order print and digital brochures online. See Renewal by Andersen Request a Brochure, <https://www.renewalbyandersen.com/forms/request-a-brochure>.

²¹ By contrast, “USA” in Renewal’s seal is in 38-point font, more than six times bigger than the fine print disclosure at the bottom of the page.

²² The same USA seal appears in Renewal magazine ads, where the fine print disclosure is similarly placed at the very bottom of the page in miniscule font. See, e.g., Renewal by Andersen Magazine Ad, https://www.seenthemagazine.com/edition/page_1894df12-a52e-5963-b2df-9f8b0e075d84.html.

MARCH 31-DAY SALE!

RENEWAL by ANDERSEN
FULL-SERVICE WINDOW & DOOR REPLACEMENT

**BUY 1, GET 1
40% OFF
WINDOWS & DOORS***

**TAKE AN ADDITIONAL
PLUS \$150 OFF
EACH WINDOW & DOOR¹**

**PLUS NO MONEY DOWN,
NO MONTHLY PAYMENTS
NO INTEREST FOR 1 FULL YEAR¹**

INSTALLATION IS ALWAYS INCLUDED
RENEWALBYANDERSEN.COM

**CALL BY MARCH 31
FOR A FREE CONSULTATION 734-743-1374**

*DETAILS OF OFFER: Offer expires 3/31/2024. Not valid with other offers or prior purchases. Buy one (1) window or entry/patio door, get one (1) window or entry/patio door 40% off and 12 months no money down, no monthly payments, no interest when you purchase two (2) or more windows or entry/patio doors between 3/1/2024 and 3/31/2024. Additional \$150 off each window or entry/patio door, no minimum purchase required, when offer is used. Offer is valid on purchase by 3/31/2024. 40% off windows and entry/patio doors are less than or equal to lowest cost window or entry/patio door in the order. Subject to credit approval. Interest is billed during the promotional period, but all interest is waived if the purchase amount is paid before the expiration of the promotional period. Financing the "Save Offer" consumer loan program is provided by Andersen Financial. Interest and late charges shall be assessed without regard to state, federal, national, single, gender or marital status. Savings comparison based on purchase of a single unit at full price. Available at participating locations and offer applies throughout the service area. See your local Renewal by Andersen location for details. License number available upon request. Some Renewal by Andersen locations are independently owned and operated. These aggregate survey of 5-star reviews among leading national full-service window replacement companies, January 2024. Reputation.com. For U.S. Power 2022 award information, visit www.power2022.com. "Renewal by Andersen" and all other marks herein are trademarks of their respective owners. © 2024 Andersen Corporation. All rights reserved. RBA12100.

²³ See, e.g., Renewal by Andersen TV Spot, ‘February: Perfect Time to Upgrade,’ iSpot (Feb. 7, 2025), <https://www.ispot.tv/ad/TZfk/renewal-by-andersen-february-perfect-time-to-upgrade>.

Of note, fine print shown at the bottom of the screen for a handful of seconds states, among other things, that “The local Renewal by Andersen retailer offering this discount is solely responsible for the content of the information provided and Renewal by Andersen Corporation assumes no responsibility in this regard.”

Offer is valid through 2/28/2025. Not valid with other offers or prior purchases. Buy one get one 20% off every window, entry or patio door plus \$300 off every window & \$600 off every door. Available on initial visit only. Valid with a minimum purchase of 4 or more units. Financing available to qualified homeowners; not all customers may qualify; higher rates apply for customers with lower credit ratings. No interest and no payments for 12 months. Repayment terms from 0 to 12 months. Interest accrues from date of purchase but waived if paid in full within 12 months. Available only at participating locations. Some Renewal by Andersen locations are independently owned and operated. Any finance terms advertised are estimates only, and all financing is provided by third-party lenders unaffiliated with Renewal by Andersen retailers, under terms and conditions arranged directly between the customer and such lender, all subject to credit requirements. Renewal by Andersen retailers do not assist with, counsel or negotiate financing, other than providing customers an introduction to lenders interested in financing. Call for complete details. The local Renewal by Andersen retailer offering this discount is solely responsible for the content of the information provided and Renewal by Andersen Corporation assumes no responsibility in this regard. 2025 Andersen Corporation. All rights reserved.

However, the seal that is used in this commercial is the same seal used throughout Renewal’s marketing materials.

²⁴ Renewal by Andersen Made in USA Commercial, Vivvix (May 7, 2025), https://truthinadvertising.org/wp-content/uploads/2025/06/RenewalbyAndersen_Vivvix_5_7_25_A_compressed.mp4.

The disclosure appears again at the end of the commercial in miniscule fine print for a matter of seconds.




²⁵ Renewal by Andersen, *Renewal by Andersen: Custom Built in the U.S.A.*, YouTube (July 19, 2018), <https://www.youtube.com/watch?v=SB0UIbRqf7w>.

²⁶ The video caption also discloses the presence of imported parts but the disclosure appears below the fold.

YouTube caption without clicking on “more”:

Renewal by Andersen: Custom Built in the U.S.A.

 **Renewal by Andersen**
4.4K subscribers Subscribe

👍 21 💬 ➦ Share ⬇️ Download ⋮


5.9K views 6 years ago

At Renewal by Andersen, our windows are custom built in the USA*. We're proud of what we do, and we're proud of where we do it. And we're especially proud of the role we play in the communities we all share.

...more

Caption after clicking on “more”:

Renewal by Andersen: Custom Built in the U.S.A.

 **Renewal by Andersen**
4.4K subscribers Subscribe

👍 21 💬 ➦ Share ⬇️ Download ⋮

5,994 views Jul 19, 2018

At Renewal by Andersen, our windows are custom built in the USA*. We're proud of what we do, and we're proud of where we do it. And we're especially proud of the role we play in the communities we all share.

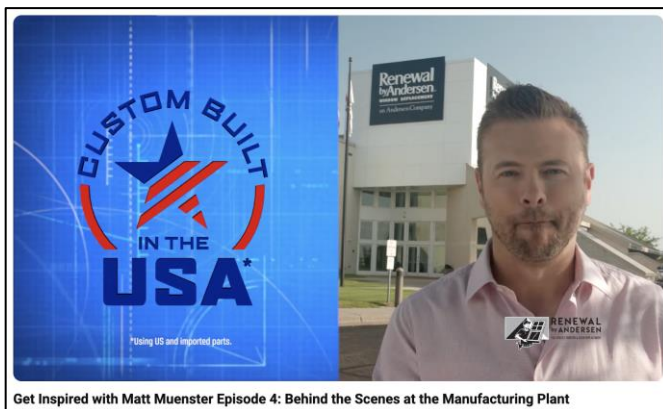
Learn more about Renewal by Andersen Signature Service: <http://bit.ly/2yUvRwH>

*Using U.S. and imported parts

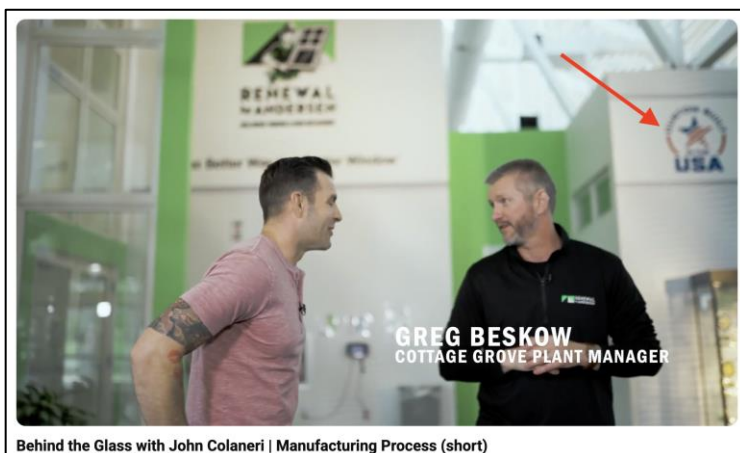
Numerous other Renewal YouTube videos feature the USA seal as well. See, e.g., Renewal by Andersen, *Double-Hung Window Design: Which Window Is Right for Your Home*, YouTube (Jan. 27, 2024), <https://www.youtube.com/watch?v=6QBW3ZY3E5A>.



Renewal by Andersen, *Get Inspired with Matt Muenster Episode 4: Behind the Scenes at the Manufacturing Plant*, YouTube (July 15, 2021), <https://www.youtube.com/watch?v=dbRYY8ArLKQ>.



²⁷ The made in USA seal also appears inside Renewal's manufacturing facility in Cottage Grove, MN. See Renewal by Andersen, *Behind the Glass with John Colaneri | Manufacturing Process* (short), YouTube (Aug. 31, 2022), <https://www.youtube.com/watch?v=tT1SoesNo2o>.



²⁸ See, e.g., Renewal by Andersen, <https://www.renewalbyandersen.com/>; Renewal by Andersen of the Greater Twin Cities About Us, <https://www.renewalbyandersen.com/window-company/077-twin-cities-mn/About-Us>.

²⁹ As the Commission has stated, disclosures must be prominent, conspicuous, and “effectively communicated to consumers before they make a purchase or incur a financial obligation.” See Fed. Trade Comm’n, .com Disclosures: How to Make Effective Disclosures in Digital Advertising, at 6 (2013), <https://www.ftc.gov/sites/default/files/attachments/press-releases/ftc-staff-revises-online-advertising-disclosure-guidelines/130312dotcomdisclosures.pdf> (“In reviewing their ads, advertisers should adopt the perspective of a reasonable consumer. They also should assume that consumers don’t read an entire website or online screen, just as they don’t read every word on a printed page. Disclosures should be placed as close as possible to the claim they qualify. Advertisers should keep in mind that having to scroll increases the risk that consumers will miss a disclosure. In addition, it is important for advertisers to draw attention to the disclosure. Consumers may not be looking for – or expecting to find – disclosures. Advertisers are responsible for ensuring that their messages are truthful and not deceptive. Accordingly, disclosures must be communicated effectively so that consumers are likely to notice and understand them in connection with the representations that the disclosures modify. Simply making the disclosure available somewhere in the ad, where some consumers might find it, does not meet the clear and conspicuous standard.”)

There can be no dispute that Renewal’s U.S.-origin disclaimers are not prominent or conspicuous.

³⁰ Renewal by Andersen Google ad seen on June 17, 2025, available at https://truthinadvertising.org/wp-content/uploads/2025/06/RenewalbyAndersen_GoogleAd_F.png.

³¹ Renewal by Andersen, Facebook Reels (May 26, 2025, 9:17 AM), <https://www.facebook.com/share/v/1EMcmUR8Ln/>.

³² Renewal by Andersen (@renewalbyandersen), Instagram (July 4, 2024), <https://www.instagram.com/reel/C9AbbKwsNaH/?igsh=MWF3aW9kaTF1aDRlaA%3D%3D>.

³³ Renewal by Andersen flyer received in the mail on June 14, 2025, https://truthinadvertising.org/wp-content/uploads/2025/06/RenewalbyAndersen_mailflyer_recieved_6_14_25_Front.png.

³⁴ The asterisk connects to a disclosure on the backside of the mailer buried in miniscule fine print that states “*Using U.S. and imported parts.” https://truthinadvertising.org/wp-content/uploads/2025/06/RenewalbyAndersen_mailflyer_recieved_6_14_25_Back.png.

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