

The FTC has announced a settlement with furniture and houseware seller Williams-Sonoma, requiring it to cease making unsubstantiated "Made in USA" claims about its products and pay \$1 million to the FTC.

Williams-Sonoma previously received a warning letter from the FTC in 2018 regarding its "crafted in America from local and imported materials" mattress pad claims because the pads were purportedly crafted in China. Williams-Sonoma promptly corrected its advertising and agreed to review their country-of-origin verification process. In response, the FTC closed the matter without further action. Here, the FTC alleges that Williams-Sonoma made misleading "Made in USA" claims about certain Goldtouch Bakeware, Rejuvenation, Pottery Barn Teen, and Pottery Barn Kids branded products. Because some of the products were imported or contained significant imported components, the FTC alleged that Williams-Sonoma's unqualified "Made in USA" claims

did not meet the FTC's "all or virtually all" standard and were therefore deceptive. As discussed in our prior <u>blog</u> post, to meet the "all or virtually all" standard necessary to make an unqualified "Made in USA" claim, a product's final assembly or processing must take place in the United States and all significant parts and processing that go into the product must be of U.S. origin. California has a "Made in USA" standard as well. The Williams-Sonoma settlement is a reminder that "Made in USA" standards are still a priority for the FTC, and the agency is willing to seek monetary fines for non-compliance.

Authors



Jared H. Bryant

Practice Attorney JBryant@perkinscoie.com 206.359.3664



Jason S. Howell

Partner JHowell@perkinscoie.com 206.359.3134

Explore more in

Consumer Protection Blog series

Consumer Protection Review

Consumer Protection Review helps businesses that market and sell to consumers navigate federal and state legal issues related to advertising, privacy, promotions, products liability, government investigations, unfair competition, class actions and general consumer protection.

View the blog