



United States of America
FEDERAL TRADE COMMISSION
Washington, D.C. 20580

Division of Advertising Practices

July 31, 2015

Ronald Y. Rothstein
Winston & Strawn, LLP
35 W. Wacker Drive
Chicago, IL 60601-9703

Re: Farnam Pet Products, FTC File No. 152-3255

Dear Mr. Rothstein:

As you know, following a referral from the National Advertising Division (“NAD”) of the Council of Better Business Bureaus, the staff of the Federal Trade Commission’s Division of Advertising Practices conducted an investigation into advertising by your client, Farnam Pet Products, for possible violations of Section 5 of the Federal Trade Commission Act, 15 U.S.C. § 45. The investigation concerned Farnam’s claim that Adams Flea & Tick Spot On for Dogs “starts killing fleas and ticks in 15 minutes.” The NAD had found that Farnam’s evidence demonstrated only that, on day 7 post-treatment, Adams starts to kill fleas and ticks in 15 minutes after infestation, and not within 15 minutes of application, as implied by the advertising. NAD referred the matter to the FTC after Farnam declined to discontinue or modify its claim as NAD recommended.

After reviewing this matter, we have decided not to recommend enforcement action at this time. Among the factors we considered was Farnam’s discontinuance of the “starts killing fleas and ticks in 15 minutes” claim by removing it from its website, packaging, and other marketing materials, and its efforts to remove the claim from third-party retailer websites.

This action is not to be construed as a determination that a violation did not occur, just as the pendency of an investigation should not be construed as a determination that a violation has occurred. The Commission reserves the right to take such further action as the public interest may require.

Very truly yours,

A handwritten signature in blue ink that reads "Mary K. Engle".

Mary K. Engle
Associate Director for Advertising Practices

cc: Andrea Levine, NAD