



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

Division of Enforcement

May 28, 2009

Richard J. Leighton, Esq.
Keller and Heckman, LLP
Washington Center
1001 G Street, N.W.
Washington, DC 20001

Re: Andrew & Suzanne Company/G-III Apparel Group, Ltd.
Matter No. 072-3148

Dear Mr. Leighton:

As you know, the staff of the Federal Trade Commission conducted an investigation of the Andrew & Suzanne Company ("Andrew & Suzanne"), a subsidiary of G-III Apparel Group, Ltd., relating to possible violations of Section 5 of the Federal Trade Commission Act, 15 U.S.C. § 45, the Fur Products Labeling Act, 15 U.S.C. § 69 *et seq.*, and the Rules and Regulations Under the Fur Products Labeling Act, 16 C.F.R. Part 301. The staff's investigation focused on whether Andrew & Suzanne sold jackets containing domestic dog fur trim and labeled other jackets as containing 100% polyester trim, when some of the trim was made of real fur.

The staff of the Enforcement Division has completed its investigation and has determined that no further action is warranted at this time. In connection with the domestic dog fur issue, FTC-commissioned testing to identify the animal that produced the fur was inconclusive. In connection with jackets labeled "100% polyester trim," many of the coats also had a hang-tag that identified the fur as real and named the animal that produced the fur. In the future, when garments contain real fur trim and other types of trim, Andrew & Suzanne stated that it will use labels that distinguish between trim containing real fur and trim containing other material. In addition, in a recent settlement of a lawsuit filed against the company by the Humane Society of the United States, Andrew & Suzanne agreed, among other things, to label all of its fur garments as containing either real or faux fur.

In light of the above, the staff has decided to close the investigation. This action is not to be construed as a determination that a violation has not occurred, 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 further action as the public interest may require.

Sincerely,

A handwritten signature in black ink, appearing to read "James A. Kohm".

James A. Kohm
Associate Director