PUBLIC RECORDS / WORKED EXAMPLE

Elk River: supplier origin claims and settlement evidence

Product diligence

Prepared by Dossier Editorial | November 18, 2026

EVIDENCE SOURCES	EVIDENCE CHECKED	PUBLISHER INSTITUTIONS
7	2026-11-18	3

SECTIONS	READER QUESTIONS	REVIEW SCOPE
8	5	Public records

EVIDENCE CHECKED	2026-11-18
EDITION	1 | Public-source research
ARTICLE	dossierplus.ai/blog/elk-river-made-in-usa-supplier-origin-verification

IMPORTANT USE NOTE

Prepared by Dossier Editorial with AI assistance from public records and published guidance. This educational document review does not claim a live Dossier investigation, supplier audit, complete court docket, human approval or legal review. It is not a product-safety certification or advice on a particular product's legal compliance.

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PART 01

The decision in brief

No. U.S. final assembly alone does not substantiate an unqualified Made in USA claim. The FTC rule also requires U.S. significant processing and all or virtually all U.S.-made and U.S.-sourced ingredients or components. The Elk River filings illustrate how to review the exact claim, underlying sourcing evidence and procedural outcome separately. They establish allegations and proposed terms, not verified payment or a product-safety finding.

Publication date: November 18, 2026. Historical event dates are identified separately. This PDF and the article use the same structured source selection and findings.

PART 02

Executive summary: verify the claim, the inputs and the outcome

- Case identity: Federal Trade Commission v. Elk River, Inc., No. 5:26-cv-02278-HNJ, Northern District of Alabama, Northeastern Division; FTC matter 2623035.
- Supported development: the complaint and proposed stipulated order carry November 17, 2026 filing stamps. The complaint alleges deceptive U.S.-origin advertising and labeling of safety harnesses; it acknowledges final assembly in Alabama.
- Proposed money terms: a $4,367,640.74 judgment, with $72,527.50 payable within seven days of entry and the remainder conditionally suspended after that payment. These are proposed obligations, not verified receipts.
- Material gaps: a component-count percentage does not reconcile, the SKU-level sourcing register was not reviewed, and court entry, payment and completed customer notices remain unverified in this review. [S1] [S2] [S6]

The practical use case is a buyer reviewing a supplier's origin claim. Record which product and dated representation are being assessed before converting a headline, factory location or settlement amount into a procurement finding.

PART 03

Match the supplier and the claim before assessing compliance

The complaint identifies Elk River, Inc. as an Alabama corporation based in Cullman and describes 130 safety-harness models with separate stock-keeping units. It says the company sells through authorized dealers and distributors. Those are descriptions in the FTC pleading; this article does not independently certify the corporate registry or every current product listing. [S1]

An unqualified origin claim, a qualified claim describing imported content, and an Assembled in USA claim answer different questions. Section 323.2 addresses unqualified labeling. FTC staff guidance explains why the share of U.S. manufacturing costs, the importance of foreign content and how far removed it is from the finished product can matter. A simple majority of component names is not the rule's test. [S4] [S5]

The proposed order separately describes conditions for an assembly claim, including substantial U.S. assembly operations and the last substantial transformation occurring in the United States. A buyer should not approve a broader origin representation merely because the supplier documents a U.S. assembly site. [S2] [S5]

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PART 04

Source-linked chronology: historical claims and a new filing

DATE AND SOURCE	WHAT THE RECORD SUPPORTS	BOUNDARY
2019 to at least June 2025; complaint, paragraph 23	The FTC describes a historical online catalog carrying U.S.-origin claims in its harness section.	A historical catalog allegation does not establish the wording of every current label. [S1]
June 2022 to June 2026; paragraphs 19-20	The complaint reproduces and dates former homepage representations.	The alleged historical website is distinct from the homepage retrieved for this review. [S1]
After the investigation began; paragraph 35	The FTC acknowledges that the alleged activities ceased after the investigation started.	The pleading gives no independent certification that all products, distributor listings or inventories were remediated. [S1]
November 17, 2026; Documents 1 and 4-1	Filed complaint and proposed stipulated order; the FTC also announces the proposed resolution.	The posted proposal's judicial signature and date fields are blank. Filing the proposal does not prove entry. [S1] [S2] [S3]
November 18, 2026; evidence check	The FTC case page lists the complaint and proposed order and labels the matter pending. The company homepage was also reviewed.	The agency index is not a certified complete court docket. This check did not verify a later entered order or payment. [S6] [S7]

The company's current homepage describes its Alabama manufacturing operation. That is company-published context, not a product-by-product origin substantiation file. The FTC's own acknowledgment of ceased conduct is also material: preserve it instead of presenting the historical allegations as a verified description of every current claim. [S1] [S7]

PART 05

Findings: a factory address and a percentage need supporting records

The complaint alleges imported components with important functions, including D-rings, carabiners, snap hooks and self-retracting lifelines. It also alleges a significant imported share of component cost without specifying an exact cost percentage in the reviewed paragraph. These are allegations; this review has not obtained the underlying purchase records, bills of materials or supplier certifications. [S1]

A useful arithmetic check exposes a specific source gap. Paragraph 31, on PDF page 8, states that 68 of 143 components and materials originate abroad, but calls that 52%. Calculating 68 divided by 143 gives approximately 47.6%. The country subtotals stated there also sum to 68. The original contains this inconsistency; the review cannot determine which figure or definition should be corrected. [S1]

Do not silently replace the source percentage or treat 47.6% as a verified foreign share for a particular harness. The paragraph describes a component-and-material count across manufacturing, not a demonstrated cost share or a model-specific bill of materials. A correction or the underlying register is needed. This arithmetic issue also does not resolve the FTC's broader allegations about significant imported content. [S1]

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For a supplier review, build a row for each SKU, claim version and relevant production period. Link the final-assembly location to manufacturing records, then link significant processing and component origins to the applicable evidence. Label unknown origins explicitly. The resulting dossier can identify what is supported without inventing a legal pass/fail score from incomplete counts. [S4] [S5]

PART 06

Read the proposed settlement without converting it into cash received

The exact proposed judgment is $4,367,640.74. Section III calls for $72,527.50 to be paid to the FTC within seven days after entry; following that payment, the remainder would be suspended subject to the stated financial-disclosure conditions. The proposal allows the suspension to be lifted on an FTC motion and court finding of material omission or misrepresentation. A headline's rounded $4.4 million is not evidence that this amount was collected. [S2] [S3]

The proposal generally provides that Elk River neither admits nor denies the complaint's allegations except as specifically stated, while admitting jurisdictional facts. It also contains specific stipulations about the allegations for later FTC enforcement and certain bankruptcy purposes. Read those limits together; neither a blanket admission nor an exoneration accurately describes the document. [S2]

Different provisions also use different customer periods. Section V concerns information for redress administration about purchases from May 8, 2023 through June 10, 2026. Section VI's notification provisions cover purchases from August 1, 2021 through June 10, 2026, with deadlines tied to entry and later identification. These periods are not interchangeable and do not by themselves establish a particular customer's refund entitlement or a notice actually delivered. [S2]

The FTC's published copy is titled a proposed order, with a blank judicial signature page. A free docket search located the case, but the associated entry query returned no entries; that incomplete retrieval cannot establish an empty docket. No later entered order, FTC payment receipt or completed notification record was verified. This article therefore describes the posted proposal's terms and leaves performance unresolved. [S2] [S6]

PART 07

Decision tree: what can the supplier dossier conclude?

1. DO YOU HAVE THE EXACT PRODUCT, DATED CLAIM AND LEGAL ENTITY?

- If established: Preserve the label or advertisement with the SKU, production period and source. Identify whether the claim is unqualified, qualified or about assembly.
- If unresolved: Keep the match unresolved. A brand name or factory address alone does not define the representation being tested.

2. DOES THE EVIDENCE SUBSTANTIATE EVERY ELEMENT OF THE CLAIM?

- If established: Record the supported locations, processing and origin facts, with their scope and dates. Keep the interpretation tied to that claim.
- If unresolved: Request the missing bill of materials, manufacturing records, origin evidence or accurate qualification. Do not substitute a component-count majority.

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3. DO THE SOURCE TOTALS AND PERCENTAGES RECONCILE?

- If established: Retain the calculation and identify its denominator: count, cost, units or another measure.
- If unresolved: Preserve the discrepancy and request a correction or underlying register. Do not silently choose a favorable number.

4. HAS A COURT ACTUALLY ENTERED THE SETTLEMENT AND HAS PERFORMANCE BEEN EVIDENCED?

- If established: Record the entered terms first; separately attach payment, notification or compliance evidence for each completed action.
- If unresolved: Describe the filed proposal or the entered obligation at its verified stage. Leave entry or performance unverified.

PART 08

Reproduce the review in a Dossier

- Define the question narrowly: does the evidence support this dated Made in USA representation for this model, and what stage has the enforcement case reached?
- Create separate records for the manufacturer, model/SKU, representation, proceeding and source document. Copy the case number from the filing stamp and retain the FTC matter number as a separate identifier.
- Capture original URLs, retrieval dates, file hashes and page references. Preserve the complaint and proposal alongside current company material rather than replacing historical evidence with today's homepage.
- Build a claim-to-evidence table with fields for assembly, significant processing, component origins, cost basis, supporting documents and unresolved gaps. Enter allegations as allegations until independently supported or adjudicated.
- Recalculate cited numbers. Here, retain 68, 143, the printed 52%, the calculated 47.6% and the missing underlying register as separate fields. Do not reuse that calculation as a legal threshold.
- Track court entry, payment and notifications as separate milestones. Use an entered order to establish deadlines and actual records to establish completed actions; the proposed customer notice is only a template.
- Generate the article and report from the same source register and qualified findings. Assign follow-up checks to specific missing originals, not a general request for more research.

This is an instructional workflow using public documents. No private supplier file was uploaded, platform investigation run or customer notification sent as part of preparing it.

PART 09

What evidence would change the answer?

The next useful installment would require an entered order or later court disposition, a corrected original resolving paragraph 31, or public evidence of payment or completed compliance. A product-specific inquiry would additionally need the relevant bill of materials, origin documentation and dated claim copies. Each would answer a different open question.

An origin-labeling case is not, by itself, a recall, proof that the equipment is unsafe, or proof that it is safe. A buyer assessing safety needs the applicable product and safety records separately. Keep that question apart from whether an origin representation is supported. [S1] [S2]

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PART 10

Questions readers ask

IS FINAL ASSEMBLY IN ALABAMA ENOUGH FOR AN UNQUALIFIED MADE IN USA CLAIM?

No. The labeling rule also requires all significant processing in the United States and all or virtually all ingredients or components to be made and sourced there. Evidence of the assembly site addresses only part of that test. [S4]

DOES A 51% U.S. COMPONENT COUNT ESTABLISH COMPLIANCE?

No. The reviewed rule and guidance do not provide that simple majority test. Component-count, cost and functional importance are different measures; a sourcing review must identify which measure its evidence actually supports. [S4] [S5]

WHY DOES THIS WALKTHROUGH FLAG THE COMPLAINT'S 52% FIGURE?

Paragraph 31 states 68 out of 143 but labels that 52%; the stated fraction is approximately 47.6%. The review preserves the inconsistency and requests the underlying register rather than claiming to know which input is wrong. [S1]

HAS ELK RIVER PAID THE PROPOSED $4.37 MILLION JUDGMENT?

This review did not verify any payment. The posted proposal specifies a $4,367,640.74 judgment, a $72,527.50 payment after entry and conditional suspension of the remainder following that payment. A proposed obligation is not a receipt. [S2]

DOES THIS FTC CASE ESTABLISH THAT ELK RIVER HARNESSES WERE RECALLED?

No. The reviewed complaint concerns alleged deceptive origin claims. These records do not establish a product recall or resolve a particular harness's safety. [S1] [S2]

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PART 11

Linked source register

Titles with a recorded URL link to that source. Entries without a URL identify retained material but do not open an original file. For any court or business record being used in litigation, obtain a certified copy directly from the clerk or filing authority and preserve the retrieval date.

S1 **FTC v. Elk River: filed complaint**
Original filed complaint. Anchor: Document 1, filed November 17, 2026; pp. 1-4 identity and assembly; pp. 4-9 historical representations and sourcing; p. 8 paragraph 31 arithmetic; pp. 9-13 allegations and relief requested. All 13 pages visually reviewed. Allegations are not adjudicated findings. The printed 68/143 and 52% inconsistency remains unresolved. · retrieved 2026-11-18

S2 **Elk River: proposed stipulated order**
Filed proposed settlement order. Anchor: Document 4-1, filed November 17, 2026; pp. 1-2 admissions limits; pp. 4-6 origin and money terms; pp. 7-8 customer periods; p. 13 blank judicial signature; p. 15 notice template. All 15 pages visually reviewed. Party signatures and filing stamp do not establish judicial entry or completed payment and notification. · retrieved 2026-11-18

S3 **FTC announcement of the Elk River action**
Agency announcement. Anchor: November 17, 2026 release; proposed resolution, rounded monetary amounts and court-approval qualification. Read with the actual filed documents, which supply exact amounts and procedural status. · retrieved 2026-11-18

S4 **16 CFR Part 323: Made in USA Labeling**
Current eCFR text. Anchor: Sections 323.1-323.3; Title 16 displayed as current through November 16, 2026 when retrieved November 18. Published by the Office of the Federal Register and Government Publishing Office. The eCFR is authoritative but unofficial; Title 16 was displayed as current through November 16, 2026. · retrieved 2026-11-18

S5 **Complying with the Made in USA Standard**
Published staff guidance. Anchor: July 2024 guidance; substantiation, foreign content, qualified claims and assembly claims. Staff guidance is not a binding Commission decision or a supplier-specific approval. Used to explain evidence questions. · retrieved 2026-11-18

S6 **FTC case page: Elk River, Inc.**
Agency case index. Anchor: Matter 2623035; pending status and November 17 complaint and proposed-order links, retrieved November 18. A bounded index check, not a certified complete court docket. No later entered order or performance record verified. · retrieved 2026-11-18

S7 **Elk River company homepage**
Company-published current context. Anchor: Manufacturing description and distributor context as retrieved November 18, 2026. Company representations are attributed, not independent sourcing or safety verification. Current copy is distinct from historical screenshots in the complaint. · retrieved 2026-11-18

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