



Christie Grymes Thompson

Partner

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About

Offering concise, actionable counsel and seamlessly integrating her efforts with her clients' legal, business, and marketing teams, Christie Grymes Thompson focuses her practice on consumer protection matters, including advertising, competitor challenges, promotions, and product safety.

Chair of the firm's Consumer Product Safety practice group, Christie uses her legal knowledge, understanding of her clients, their business, and their products, and proactive compliance counseling to keep national advertisers and consumer products manufacturers and retailers on the right side of the law and out of the crosshairs of regulators, competitors, and consumers.

If inquiries, investigations, enforcement actions, or litigation arise, Christie serves as a determined and effective advocate, protecting clients before federal and state law enforcement agencies and self-regulatory bodies. She lowers the temperature of contested matters, leveraging her persuasiveness and the credibility and trust she's earned with regulators and opposing counsel to find efficient solutions aligned with her clients' business interests.

As one client told *Chambers USA: America's Leading Lawyers for Business*, Christie delivers "outstanding technical industry knowledge" and is "practical, responsive, efficient and fun to work with."

Christie's clients span a wide range of industries and companies, including technology service providers, fashion brands, retailers, renewable energy providers, and manufacturers of home appliances, lawn and garden equipment, climate solutions, jewelry, battery-powered goods, and other consumer products.

She advises clients on all aspects of regulatory compliance, including statutes and regulations enforced by the FTC, Consumer Product Safety Commission (CPSC), and State AGs. To that end, Christie reviews advertisements and marketing materials for all media, including television, print, and social media, to determine compliance with relevant regulations and minimize the risk of challenges or regulatory scrutiny.

Christie defends her clients in enforcement actions, class actions, and other litigation involving claim substantiation, use of endorsers, sale pricing practices, green marketing, ESG claims, cause marketing campaigns, financial offers, and mobile disclosures, among other matters. She also initiates challenges to competitors' advertising before the National Advertising Division (NAD) and

National Advertising Review Board (NARB), as well as in federal court under the Lanham Act, to help clients protect their brands in the marketplace.

In her consumer product safety practice, Christie works with her clients to ensure their products meet applicable safety standards, including complying with the Consumer Product Safety Improvement Act (CPSIA), the Consumer Product Safety Act (CPSA), the Federal Hazardous Substances Act (FHSA), the Poison Prevention Packaging Act (PPPA), and the Flammable Fabrics Act (FFA).

Christie assists clients in developing product safety compliance programs, analyzing potential reporting obligations, coordinating with other parties in the distribution chain, implementing product recalls, defending against enforcement and penalty proceedings with the CPSC, and responding to FOIA requests. Christie also helps companies identify and resolve potential product safety and confidentiality issues before such challenges can escalate into negative publicity or regulatory concerns.

Regularly recognized by her peers for her professional accomplishments, Christie was named the 2016 and 2019 Washington, DC, Advertising “Lawyer of the Year” by *Best Lawyers*[®] and has been ranked nationally as a leading practitioner in the Advertising: Transactional & Regulatory area by *Chambers USA*. She is active in various philanthropic and educational endeavors and uses her legal talents to help underserved communities in the Washington, DC, area.

Experience

Advertising Challenges

Represented major U.S. retailers in several FTC investigations involving the alleged mislabeling of fur clothing as “faux fur.” The FTC staff closed each investigation without further action.

Represented a major retailer in a settlement with the FTC regarding the Textile Act and references to bamboo fibers. Citing an infrequently used provision of the FTC Act, the FTC relied on a synopsis of previous cases to seek civil penalties.

Represented a privately owned vacuum cleaner and floor care product manufacturing corporation in a Lanham Act case challenging comparative superiority claims made by a vacuum cleaner manufacturer in connection with one of its products.

Represented an American manufacturer of agricultural and construction machinery in a competitor claims matter that the NAD referred to the FTC for further review, after the companies declined to participate in a review of advertising claims made for their corn kernel processing equipment.

Represented a telecommunications holding company in a network challenge followed by two Lanham Act cases challenging implied superiority and establishment claims made by a competitor in connection with a new product launch.

Represented a vacuum cleaner and floor care product manufacturing corporation in an appeal to the National Advertising Review Board (NARB) of an NAD decision in which the NAD ruled that a competitor had provided reliable testing that could substantiate the claim that their device “Out Cleans All Other Leading Brands.” The NARB determined that the competitor’s testing did not demonstrate a meaningful difference between the competitor’s and our client’s products, and therefore that the competitor did not meet the burden of demonstrating that its testing demonstrated superiority.

Represented a leading computer maker in litigation initiated by the Attorney General of the State of New York (Andrew Cuomo) alleging that the company violated Sections 349 and 350 of NY's General Business Law and Section 63(12) of NY's Executive Law in connection with the company's financing promotions, service contract and warranty offers, and rebate fulfillment. Negotiated a settlement providing for injunctive relief and restitution on terms that were previously agreed to with the remaining 49 state attorneys general.

Represented an online dating service before the NAD in a case challenging an online portal's competing service use of various superiority claims. The NAD found that the "Find better first dates..." claim is expressively comparative, unsupported by the record and outside the realm of puffery, and also concluded that the "... finding great people to date..." claim is an objectively provable claim that is unsupported by the record and is not puffery. The online portal discontinued both advertising claims.

Represented a seller of travel services in an investigation conducted by the District of Columbia Attorney General's Office alleging inadequate disclosures.

Represented the American chemical industry trade association before the NAD in a case challenging advertising claims made by a baby bottle manufacturer. The claims at issue attempted to exploit a minority of scientific opinion in the sale of baby bottles that do not contain bisphenol-A. The NAD agreed that the baby bottle manufacturer's claims were unsubstantiated and recommended that they be discontinued.

Commercial Co-ventures and Charitable Promotions

Represented a popular classic athletic shoe brand in structuring and advertising a promotion for the (RED) Campaign, in which a portion of proceeds from the sale of certain sneakers are donated to The Global Fund to Fight AIDS, Tuberculosis and Malaria.

Represented a leading athletic shoe manufacturer in structuring and advertising a promotion in which a portion of the proceeds from specially marked products go to a global campaign founded by the United Nations High Commissioner for Refugees (UNHCR) to bring education and sport programs to the world's refugee youth.

Represented an American multinational conglomerate corporation in structuring promotions to benefit The Susan G. Komen Breast Cancer Foundation and City of Hope.

Represented a leading computer manufacturer in structuring promotions to benefit The Susan G. Komen Breast Cancer Foundation and The Global Fund to fight AIDS in Africa.

Consumer Product Safety

Represented a *Fortune* 100 multinational manufacturer of a variety of commercial and consumer products, engineering services and aerospace systems in negotiating a civil penalty settlement with the CPSC.

Represented a national department store in conducting a recall and the settlement of a civil penalty investigation involving drawstrings in children's clothing.

Advises a trade association of lawn and garden equipment manufacturers and its members on various matters before the CPSC, including tracking standards development activity.

Advises a *Fortune* 100 manufacturer of fire and security alarm systems product safety regarding compliance programs, evaluation of potential CPSC reporting obligations, recalls and responses to Freedom of Information Act (FOIA) requests.

Represents a manufacturer of electrical products and tools in developing a product safety compliance program and in evaluating potential CPSC reporting obligations.

Advises retailers of children's products to establish vendor protocols for compliance issues.

Represents a publishing company regarding compliance issues.

Advises an international conglomerate regarding quality control procedures for manufacturing and in developing a product safety compliance program.

Coordinated efforts on behalf of a children's toys manufacturer to release imported goods detained by the CPSC and CBP at the Commercial Targeting Analysis Center.

Represented an equipment manufacturer in responding to Letters of Advice issued by the CPSC staff.

Represented a manufacturer of outdoor recreational equipment in filing a precautionary report to the CPSC in coordination with the supplier.

Represented manufacturers, distributors and retailers in civil penalty investigations that the CPSC staff closed without the issuance of a penalty.

Represented manufacturers, distributors and retailers in the recall of millions of products, including toys and games, home appliances, children's clothing, lighting, air filtration systems, sporting goods, and fire and security alarm systems.

Filed comments on behalf of two trade associations in regulation review proceedings.

Pro Bono

Elected to the Board of Trustees for the Legal Aid Society of the District of Columbia.

Represent national charity on charitable promotions and contractual relationships with vendors and marketing partners.

Honors

Named 2016 and 2019 D.C. Advertising "Lawyer of the Year" by *Best Lawyers*®.

The Best Lawyers in America® (Woodward/White, Inc.), Advertising Law, 2012-2027.

Ranked nationally as a leading practitioner in the Advertising: Transactional and Regulatory area by *Chambers USA*, 2011-2026.

Recognized as a leading attorney in the Media and Advertising practice area by Washington D.C. *Super Lawyers*., 2014, 2017-2020 and 2023-2026.

Recommended in *US Legal 500* for her work in the Marketing and Advertising Law – Transactional and Regulatory area, 2012-2024 and 2026 and in the Marketing and Advertising Litigation area, 2012-2021.

Named Washington D.C. Advertising Law – Attorney of the Year, 2020 and 2024 by Global Law

Experts.

Named one of *SmartCEO* magazine's "Washington Legal Elite," 2007.

Affiliations

American Bar Association, Section of Antitrust Law, Committee Operations Committee, co-chair

American Bar Association, Section of Antitrust Law, Membership and Diversity Committee; former vice chair

American Bar Association, Section of Antitrust Law, Nominating Committee, member

American Bar Association, Section of Antitrust Law, Consumer Protection Committee, former chair

American Bar Association, Section of Antitrust Law, Long Range Planning Committee, former vice chair

Community

Coca-Cola Scholars Foundation, National Selection Committee, alumni advisory board

Related Services

Advertising and Marketing

Advertising Technology (AdTech)

Blockchain and Cryptocurrency

Consumer Class Action Defense

Consumer Product Safety Regulation

Cybersecurity Counseling and Compliance

Environmental, Social and Governance (ESG)

Fashion and Retail

Federal Trade Commission

Manufacturing

NAD and NARB Challenges

Nonprofit Organizations

State Attorneys General

Technology

Education

The George Washington University Law School, J.D.

The University of Texas at Austin, B.B.A.

Admissions

District of Columbia

Maryland

Courts

U.S. Supreme Court