

Note: Below are copies of all 95 letters sent to MLM companies (in alphabetical order) alerting them of TINA.org's 2023 income claims investigation findings.



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Traci Gunderson, Legal Senior VP
4Life
9850 South 300 West
Sandy, UT 84070-3262
tracigunderson@4life.com

Re: Deceptive Income Claims Used to Market the 4Life Business Opportunity

Dear Ms. Gunderson:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that 4Life is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-4life-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Greg Provenzano, President
ACN, Inc.
1000 Progress Place
Concord, NC 28025-2449

Re: Deceptive Income Claims Used to Market the ACN, Inc. Business Opportunity

Dear Mr. Provenzano:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that ACN, Inc. is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-acn-income-claims-database/>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Todd Martin, General Counsel
AdvoCare International, LLC
2800 Telecom Pkwy
Richardson, TX 75082-3514
tmartin@advocare.com

Re: Deceptive Income Claims Used to Market the AdvoCare Business Opportunity

Dear Mr. Martin:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that AdvoCare International is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-advocare-income-claims-database/>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Joseph Urso, CEO
Aerus LLC
14841 Dallas Pkwy, Suite 500
Dallas, TX 75254-7689
jurso@aerusonline.com

Re: Deceptive Income Claims Used to Market the Aerus Business Opportunity

Dear Mr. Urso:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Aerus LLC is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-aerus-income-claims-database/>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads "L Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Cathy McKenna, President
Aloette Cosmetics, Inc.
1601 Cedar Lane Road, Suite #20
Greenville, SC 29617-2347
cmckenna@aloette.com

Re: Deceptive Income Claims Used to Market the Aloette Cosmetics Business
Opportunity

Dear Ms. McKenna:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. See <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Aloette Cosmetics is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-aloette-income-claims-database/>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Andrea Neipp, Chief Marketing Officer
Amare Global
17872 Gillette Avenue
Suite 100, Irvine, CA 92614
aneipp@amare.com

Re: Deceptive Income Claims Used to Market the Amare Global Business
Opportunity

Dear Ms. Neipp:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. See <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Amare Global is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-amare-global-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L. Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Stephanie Moore, General Counsel
Ambit Energy
6555 Sierra Drive
Irving, TX 75039
stephanie.moore@vistracorp.com

Re: Deceptive Income Claims Used to Market the Ambit Energy Business
Opportunity

Dear Ms. Moore:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Ambit Energy is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-ambit-income-claims-database/>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Rainey Repins, General Counsel
Amway
7575 Fulton Street East
Ada, MI 49355-0001
rainey.repins@amway.com

Re: Deceptive Income Claims Used to Market the Amway Business Opportunity

Dear Ms. Repins:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Amway is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-amway-income-claims-database/>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Bernadette Chala, Chief Legal Officer
Arbonne International, LLC
9400 Jeronimo Road
Irvine, CA 92618-1907
bchala@arbonne.com

Re: Deceptive Income Claims Used to Market the Arbonne Business Opportunity

Dear Ms. Chala:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Arbonne International is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-arbonne-income-claims-database/>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads "L Smith". The signature is written in a cursive, flowing style.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Jonathan D. Gelfand, Esq., Chief Legal Officer
Team Beachbody
400 Continental Boulevard, 4th Floor
El Segundo, CA 90245-5076
jgelfand@beachbody.com

Re: Deceptive Income Claims Used to Market the BODi/Team Beachbody Business Opportunity

Dear Mr. Gelfand:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that BODi/Team Beachbody is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-bodi-income-claims-database/>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L. Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Steve J. Flipse, President
Calerie Health Holding, LLC
200 Spectrum Center Drive, Suite 2100
Irvine, CA 92618
sflipse@calerie.com

Re: Deceptive Income Claims Used to Market the Calerie Health Business
Opportunity

Dear Mr. Flipse:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Calerie Health is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-caleriehealth-income-claims-database/>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L. Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Robert Shumway, Vice President
Carico International
2851 Cypress Creek Road
Fort Lauderdale, FL 33309-1705
shumayr@carico.com

Re: Deceptive Income Claims Used to Market the Carico International Business Opportunity

Dear Mr. Shumway:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Carico International is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-carico-income-claims-database/>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith". The signature is written in a cursive, flowing style.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Mindy Lin, Founder and CEO
Damsel in Defense
12336 W. Overland Road
Boise, Idaho, 83709
mindy@damseldefense.net

Re: Deceptive Income Claims Used to Market the Damsel in Defense Business Opportunity

Dear Ms. Lin:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Damsel in Defense is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-damseldefense-income-claims-database/>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L. Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Rakesh Bandi, Regional Marketing Director
Daxen, Inc.
565 Brea Canyon Rd., Suite B
Walnut, CA 91789-3004
rbandi@dxnla.com

Re: Deceptive Income Claims Used to Market the Daxen Business Opportunity

Dear Mr. Bandi:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Daxen is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-daxen-income-claims-database/>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Dave Doxey, General Counsel
doTerra
389 South 1300 West Street
Pleasant Grove, UT 84062
dadoxey@doterra.com

Re: Deceptive Income Claims Used to Market the doTerra Business Opportunity

Dear Mr. Doxey:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that doTerra is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-doterra-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L. Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Ursula Dudley Oglesby, President and CEO
Dudley Beauty Corp, LLC
1835 Eastchester Drive
High Point, NC 27265-1403
ursula@dudleyq.com

Re: Deceptive Income Claims Used to Market the Dudley Beauty Business
Opportunity

Dear Ms. Oglesby:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Dudley Beauty is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-dudley-beauty-income-claims-database/>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L. Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Arthur Johnson, National Sales & Marketing Director
Enagic USA Inc.
4115 Spencer St
Torrance, CA 90503-2419
arthur.j@enagic.com

Re: Deceptive Income Claims Used to Market the Enagic Business Opportunity

Dear Mr. Johnson:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Enagic is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-enagic-income-claims-database/>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Keegan Miller, Chief Compliance Officer
ENERGETIX GmbH & Co. KG
209 West Deerfield Lane
Dahlonega, GA 30533
keegan.miller@energetixholdings.com

Re: Deceptive Income Claims Used to Market the Energetix Business Opportunity

Dear Mr. Miller:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that ENERGETIX GmbH & Co. KG is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-energetix-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith". The signature is written in a cursive, flowing style.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Liliana Ramírez, Marketing Manager
Enzacta USA
1712 Pioneer Avenue, Suite 794
Cheyenne, WY 82001-4406
marketing@enzacta.net

Re: Deceptive Income Claims Used to Market the Enzacta USA Business Opportunity

Dear Ms. Ramírez:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Enzacta USA is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-enzacta-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Carrie Charlick, CEO
Essential Bodywear
3167 Ridgeway Court
Commerce, MI 48390
carrie@essentialbodywear.com

Re: Deceptive Income Claims Used to Market the Essential Bodywear Business Opportunity

Dear Ms. Charlick:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Essential Bodywear is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-essential-body-wear-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L. Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Macie Hawkes, General Counsel
eXp Realty
The Promenade II
1230 Peachtree Street, Suite 1900
Atlanta, GA 30309
macie.hawkes@exprealty.com

Re: Deceptive Income Claims Used to Market the eXp Realty Business Opportunity

Dear Ms. Hawkes:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that eXp Realty is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-exp-realty-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Dan Duggan, CEO
Health-Mor/FilterQueen
1 American Road, Suite 1250
Brooklyn, OH 44144-2301
dduggan@filterqueen.com

Re: Deceptive Income Claims Used to Market the Health-Mor/FilterQueen
Business Opportunity

Dear Mr. Duggan:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Health-Mor (and its FilterQueen brand) is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-filterqueen-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L. Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Darin Reber, General Counsel
Forever Living
7501 East McCormick Parkway
Scottsdale, Arizona 85258
dreber@foreverliving.com

Re: Deceptive Income Claims Used to Market the Forever Living Business
Opportunity

Dear Mr. Reber:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Forever Living is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-forever-living-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L. Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Michael Starr, CEO
Global Domains International, Inc.
701 Palomar Airport Road #300
Carlsbad, CA 92011-1028
michael@starr.ws

Re: Deceptive Income Claims Used to Market the Global Domains International
Business Opportunity

Dear Mr. Starr:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. See <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Global Domains International is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-global-domains-international-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith". The signature is fluid and cursive, with the first letter of the last name being a large, stylized "S".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Henry Wang, General Counsel
Herbalife Nutrition
800 West Olympic Blvd., Suite 406
Los Angeles, CA 90015-1367
henryw@herbalife.com

Re: Deceptive Income Claims Used to Market the Herbalife Business Opportunity

Dear Mr. Wang:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Herbalife Nutrition is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-herbalife-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith". The signature is written in a cursive, flowing style.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Jessica Marquez, Chief Legal Officer
Hy Cite Enterprises, LLC/Royal Prestige
3252 Pleasant View Road
Middleton, WI 53562-4840
jmarquez@hycite.com

Re: Deceptive Income Claims Used to Market the Hy Cite/Royal Prestige Business Opportunity

Dear Ms. Marquez:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Hy Cite Enterprises (and its Royal Prestige brand) is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-royal-prestige-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L. Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Mauricio Domenzain, CEO
Immunotec Research Inc.
1780 Hughes Landing Blvd. Ste. 1175
The Woodlands, TX 77380-4058
mauricio@immunotec.com

Re: Deceptive Income Claims Used to Market the Immunotec Business Opportunity

Dear Mr. Domenzain:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Immunotec Research Inc. is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-immunotec-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Kevin Heaphy, General Counsel
Isagenix International
155 E. Rivulon Blvd.
Gilbert, AZ 85297-0002
kevin.heaphy@isagenixcorp.com

Re: Deceptive Income Claims Used to Market the Isagenix Business Opportunity

Dear Mr. Heaphy:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Isagenix International is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-isagenix-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L. Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Anna Morkos, Director of Legal Affairs
JAFRA Cosmetics International, Inc.
2451 Townsgate Road
Westlake Village, CA 91361-2506
anna_morkos@jafra.com

Re: Deceptive Income Claims Used to Market the JAFRA Cosmetics International
Business Opportunity

Dear Ms. Morkos:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that JAFRA Cosmetics International is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-jafra-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads "L Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Melissa Shoop, CEO & Founder
Java Momma
1426 Ferry St, Suite 102
Danville, PA 17821-1001
melissa@javamomma.com

Re: Deceptive Income Claims Used to Market the Java Momma Business Opportunity

Dear Ms. Shoop:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Java Momma is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-java-momma-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Bret Bonacorsi, CEO
jBloom
2103 Parkway Drive
Saint Peters, MO 63376-6460
bret@jbloomdesigns.com

Re: Deceptive Income Claims Used to Market the jBloom Business Opportunity

Dear Mr. Bonacorsi:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that jBloom is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-jbloom-designs-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L. Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

John Amico Jr., CEO
John Amico Haircare Products
4731 West 136th Street
Crestwood, IL 60445-1968
johnamico@johnamico.com

Re: Deceptive Income Claims Used to Market the John Amico Haircare Products
Business Opportunity

Dear Mr. Amico:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that John Amico Haircare Products is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-john-amico-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L. Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Nancy Bogart, CEO & Founder
Jordan Essentials
1520 N. Commercial Drive
Nixa, MO 65714-7922
nancy@jordanessentials.com

Re: Deceptive Income Claims Used to Market the Jordan Essentials Business
Opportunity

Dear Ms. Bogart:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Jordan Essentials is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-jordan-essentials-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Sasha Laman, Vice President of Global Marketing
The Juice Plus+ Company, LLC
140 Crescent Drive
Collierville, TN 38017-3374
sasha.laman@juiceplus.com

Re: Deceptive Income Claims Used to Market the Juice Plus+ Company Business Opportunity

Dear Ms. Laman:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that The Juice Plus+ Company, LLC is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-juice-plus-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L. Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Brian Kaminski, CEO
L'Bri Pure n' Natural
909 Perkins Drive
Mukwonago, WI 53149-1400
brian@lbri.com

Re: Deceptive Income Claims Used to Market the L'Bri Pure n' Natural Business Opportunity

Dear Mr. Kaminski:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that L'Bri Pure n' Natural is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-lbri-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Warren Schlichting, CEO
LegalShield
1 Prepaid Way
Ada, OK, 74820-5813
warrenschlichting@legalshield.com

Re: Deceptive Income Claims Used to Market the LegalShield Business Opportunity

Dear Mr. Schlichting:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that LegalShield is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-legalshield-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Heidi Leist, CEO
Lemongrass Spa Products
720 Anclote Road
Tarpon Springs, FL 34689-6703
leisth@lemongrassspa.com

Re: Deceptive Income Claims Used to Market the Lemongrass Spa Business Opportunity

Dear Ms. Leist:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Lemongrass Spa Products is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-lemongrass-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L. Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

David DeBora, CEO
Lifestyles USA
8100 Keele Street
Vaughan, Ontario L4K 2A3
Canada
ddebora@lifestyles.net

Re: Deceptive Income Claims Used to Market the Lifestyles USA Business
Opportunity

Dear Mr. DeBora:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Lifestyles USA is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-lifestyles-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L. Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Alissa Neufeld, General Counsel
LifeVantage
3300 N Triumph Blvd, #700
Lehi, UT 84043-6477
aneufeld@lifevantage.com

Re: Deceptive Income Claims Used to Market the LifeVantage Business Opportunity

Dear Ms. Neufeld:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that LifeVantage is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-lifevantage-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Erin Barta, General Counsel
Mannatech, Inc.
1410 Lakeside Parkway, Suite 200
Flower Mound, TX 75028-4026
ebarta@mannatech.com

Re: Deceptive Income Claims Used to Market the Mannatech Business Opportunity

Dear Ms. Barta:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Mannatech is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-mannatech-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L. Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Marc Ashley, CEO
Market America, Inc.
1302 Pleasant Ridge Road
Greensboro, NC 27409-9415
marc@marketamerica.com

Re: Deceptive Income Claims Used to Market the Market America Business Opportunity

Dear Mr. Ashley:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Market America is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-market-america-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L. Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Julia Simon, Chief Legal Officer
Mary Kay Inc.
16251 Dallas Parkway
Addison, Texas 75001
julia.simon@mkcorp.com

Re: Deceptive Income Claims Used to Market the Mary Kay Business Opportunity

Dear Ms. Simon:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Mary Kay Inc. is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-mary-kay-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Jason Groves, Chief Legal Officer
Medifast/Optavia
100 International Drive, 18th Floor
Baltimore, MD 21202-4679
jason.groves@medifastinc.com

Re: Deceptive Income Claims Used to Market the Medifast/Optavia Business
Opportunity

Dear Mr. Groves:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Medifast/Optavia is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-optavia-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Aaron Eddington, Chief Legal Officer
Melaleuca, Inc.
4609 W. 65th Street
Idaho Falls, ID 83402-5742
aeddington@melaleuca.com

Re: Deceptive Income Claims Used to Market the Melaleuca Business Opportunity

Dear Mr. Eddington:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Melaleuca, Inc. is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-melaleuca-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Michelle Wilson, Chief Legal Counsel
Modere USA, Inc.
4000 MacArthur Blvd., Suite 450
Newport Beach, CA 92660-2558
michellew@modere.com

Re: Deceptive Income Claims Used to Market the Modere USA Business Opportunity

Dear Ms. Wilson:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Modere USA, Inc. is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-modere-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith". The signature is fluid and cursive, with the first letter of the last name being a large, stylized "S".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Carla Hernandez, Vice President Brand Marketing and Communication
Monat Global
10000 NW 15th Terrace
Doral, Florida, 33172
carlah@monatglobal.com

Re: Deceptive Income Claims Used to Market the Monat Global Business
Opportunity

Dear Ms. Hernandez:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Monat Global is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-monat-global-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L. Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Toshiya Kamijo, CEO
Nefful U.S.A., Inc.
18563 East Gale Avenue
City of Industry, CA 91748-1339
toshiya.kamijo@neffulusa.com

Re: Deceptive Income Claims Used to Market the Nefful U.S.A. Business Opportunity

Dear Mr. Kamijo:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Nefful U.S.A., Inc. is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-nefful-usa-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L. Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Kendra Brassfield, CEO
NeoLife International, LLC
4555 Great America Parkway, Suite 220
Santa Clara, CA 95054-1221
kendrab@neolife.com

Re: Deceptive Income Claims Used to Market the NeoLife International Business Opportunity

Dear Ms. Brassfield:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that NeoLife International is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-neolife-international-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Gail Lane, General Counsel
Neora, LLC
4201 Spring Valley Road, Suite 900
Dallas, TX 75244-3631
glane@neora.com

Re: Deceptive Income Claims Used to Market the Neora Business Opportunity

Dear Ms. Lane:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Neora is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-neora-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Bilal Ruknudeen, CEO
New Earth Life Sciences
565 Century Court
Klamath Falls, OR 97601-7100
bilalr@newearth.com

Re: Deceptive Income Claims Used to Market the New Earth Life Sciences Business Opportunity

Dear Mr. Ruknudeen:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that New Earth Life Sciences is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-new-earth-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L. Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Claire Parnell, Director of Brand Management
NHT Global, Inc.
609 Deep Valley Drive, Suite 395
Rolling Hill Estates, CA 90274-3629
claire.parnell@nhtglobal.com

Re: Deceptive Income Claims Used to Market the NHT Global Business Opportunity

Dear Ms. Parnell:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that NHT Global, Inc. is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-nht-global-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads "L Smith". The signature is fluid and cursive, with the first letter of the last name being a large, stylized "S".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Tim Krimm, Vice President of Business Development
Noevir USA, Inc.
1095 Main Street
Irvine, CA 92614-6715
tkrimm@noevirusa.com

Re: Deceptive Income Claims Used to Market the Noevir USA, Inc. Business Opportunity

Dear Mr. Krimm:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Noevir USA, Inc. is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-noevir-usa-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L. Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Rebecca Stegman, Marketing Communications Manager
Noonday
1825 E. 38 1/2 Street
Austin, TX 78722-1341
becca.stegman@noondaycollection.com

Re: Deceptive Income Claims Used to Market the Noonday Business Opportunity

Dear Ms. Stegman:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Noonday is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-noonday-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L. Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Chayce Clark, General Counsel
Nu Skin Enterprises
75 West Center Street
Provo, UT 84601-4432
chayce.clark@nuskin.com

Re: Deceptive Income Claims Used to Market the Nu Skin Enterprises Business Opportunity

Dear Mr. Clark:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Nu Skin Enterprises is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-nuskin-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L. Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbnp.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Monica Vargas, In House Counsel
Omnilife USA, Inc.
6900 Dallas Parkway
Suite 870
Plano, TX 75024
monica.vargas@omnilife.com

Re: Deceptive Income Claims Used to Market the Omnilife USA, Inc. Business Opportunity

Dear Ms. Vargas:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Omnilife USA, Inc. is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-omnilife-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L. Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Jennifer Crawford, General Counsel
Pampered Chef
One Pampered Chef Lane
Addison, IL 60101-1498
jcrawford@pamperedchef.com

Re: Deceptive Income Claims Used to Market the Pampered Chef Business
Opportunity

Dear Ms. Crawford:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Pampered Chef is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-pampered-chef-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L. Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Craig White, CEO
PaperPie
5402 S. 122nd E Avenue
Tulsa, OK 74146
info@paperpie.com
craig.white@edcpub.com

Re: Deceptive Income Claims Used to Market the PaperPie Business Opportunity

Dear Mr. White:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that PaperPie is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-paperpie-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L. Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Tammy Roseborough, Director of Marketing
pawTree
P.O. Box 92902
Southlake, TX 76092-0902
tammy@pawtree.com

Re: Deceptive Income Claims Used to Market the pawTree Business Opportunity

Dear Ms. Roseborough:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that pawTree is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-pawtree-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Angelo Ninivaggi, General Counsel
Plexus Worldwide Inc.
9145 East Pima Center Parkway
Scottsdale, AZ 85258-4627
angelo.ninivaggi@plexus.com

Re: Deceptive Income Claims Used to Market the Plexus Worldwide Business Opportunity

Dear Mr. Ninivaggi:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Plexus Worldwide is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-plexus-worldwide-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L. Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Rolf Sorg, CEO
PM-International AG
1012 Corporate Lane
Export, PA 15632
rolf.sorg@pm-international.com

Re: Deceptive Income Claims Used to Market the PM-International
Business Opportunity

Dear Mr. Sorg:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that PM-International is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-pminternational-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L. Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Ben Rogers, General Counsel
Primerica, Inc.
1 Primerica Parkway
Duluth, GA 30099-0001
ben.rogers@primerica.com

Re: Deceptive Income Claims Used to Market the Primerica Business Opportunity

Dear Mr. Rogers:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Primerica is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-primerica-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Amarlis Santana, Legal Compliance Coordinator
Princess House, Inc.
470 Myles Standish Blvd.
Taunton, MA 02780
asantana@princesshouse.com

Re: Deceptive Income Claims Used to Market the Princess House, Inc. Business Opportunity

Dear Ms. Santana:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Princess House, Inc. is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-princess-house-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L. Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Brian Underwood, CEO
Prüvit
901 Sam Rayburn Highway
Melissa, Texas 75454
brian@pruvithq.com

Re: Deceptive Income Claims Used to Market the Prüvit Business Opportunity

Dear Mr. Underwood:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Prüvit is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-pruvit-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L. Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Miranda Inglis, CEO
Pure Haven
1 Carding Lane
Johnston, RI 02919-4621
miranda@purehavenessentials.com

Re: Deceptive Income Claims Used to Market the Pure Haven Business Opportunity

Dear Ms. Inglis:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Pure Haven is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-pure-haven-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Stephen Merrick, General Counsel
Reliv International, Inc.
136 Chesterfield Industrial Blvd.
Chesterfield, MO 63005-1220
smerrick@relivinc.com

Re: Deceptive Income Claims Used to Market the Reliv International Business Opportunity

Dear Mr. Merrick:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Reliv International is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-reliv-international-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L. Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Robert Carollo, Assistant General Counsel
Rexair LLC
2600 W. Big Beaver Road, Ste. 555
Troy, MI 48084-3337
rcarollo@rexairllc.com

Re: Deceptive Income Claims Used to Market the Rexair Business Opportunity

Dear Mr. Carollo:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Rexair LLC is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-rexair-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Marjorie Goux, Chief Legal Officer
Rodan & Fields
3001 Bishop Drive, Suite 450
San Ramon, California 94583
mgoux@rodanandfields.com

Re: Deceptive Income Claims Used to Market the Rodan & Fields Business Opportunity

Dear Ms. Goux:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Rodan & Fields is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-rodan-fields-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Miriam Mayr, Executive Director of Sales & Marketing
Sabika, Inc.
6450 Steubenville Pike
Pittsburgh, PA 15205-1004
miriam.mayr@sabikajewelry.com

Re: Deceptive Income Claims Used to Market the Sabika Business Opportunity

Dear Ms. Mayr:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Sabika is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-sabika-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Milissa Rick, Executive Vice President & Chief Marketing Officer
Regal Ware, Inc./Saladmaster
1675 Reigle Drive
Kewaskum, WI 53040-8923
mrick@regalware.com

Re: Deceptive Income Claims Used to Market the Regal Ware/Saladmaster
Business Opportunity

Dear Ms. Rick:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Regal Ware (and its Saladmaster brand) is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-saladmaster-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L. Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Carlos Marín, Global Marketing Director
Sanki Global, LLC
105 N. Pecos Road. Suite 140
Henderson, NV 89074-1917
carlos.marin@sankiglobal.com

Re: Deceptive Income Claims Used to Market the Sanki Global Business Opportunity

Dear Mr. Marín:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Sanki Global is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-sanki-global-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L. Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Eric Ritter, General Co-Counsel
Scentsy
2901 E Pine Avenue
Meridian, ID 83642-5980
eritter@scentsy.com

Re: Deceptive Income Claims Used to Market the Scentsy Business Opportunity

Dear Mr. Ritter:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Scentsy is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-scentsy-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L. Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Michael Modd, Chief Legal Officer
SeneGence International
301 S. Main Street
Sapulpa, OK 74066-4109
mmodd@senegence.com

Re: Deceptive Income Claims Used to Market the SeneGence International Business Opportunity

Dear Mr. Modd:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that SeneGence International is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-senegence-international-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads "Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Matt Town, General Counsel
Shaklee
6920 Koll Center Parkway, Suite 211
Pleasanton, CA 94566
mtown@shaklee.com

Re: Deceptive Income Claims Used to Market the Shaklee Business Opportunity

Dear Mr. Town:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Shaklee is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-shaklee-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L. Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Ben Huddleston, General Counsel
Southwestern Advantage
2451 Atrium Way
Nashville, TN 37214-5102
bhuddleston@southwestern.com

Re: Deceptive Income Claims Used to Market the Southwestern Advantage Business Opportunity

Dear Mr. Huddleston:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. See <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Southwestern Advantage is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-southwestern-advantage-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Cori Hancock, Vice President of Marketing
Stampin' Up!
12907 South 3600W
Riverton, UT 84065-6972
chancock@stampinup.com

Re: Deceptive Income Claims Used to Market the Stampin' Up! Business Opportunity

Dear Ms. Hancock:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Stampin' Up! is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-stampin-up-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Victoria Staite, Strategic Marketing Director
Steeped Tea Inc.
50 Bittern Street, Unit 16
Ancaster, Ontario L9G 4V5
Canada
vstaite@steepedtea.com

Re: Deceptive Income Claims Used to Market the Steeped Tea Business Opportunity

Dear Ms. Staite:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Steeped Tea Inc. is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-steeped-tea-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads "Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Deborah Bursely, Chief Marketing Officer
Sunrider International
1625 Abalone Avenue
Torrance, CA 90501-2860
deborah.bursley@sunrider.com

Re: Deceptive Income Claims Used to Market the Sunrider International Business Opportunity

Dear Ms. Bursely:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Sunrider International is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-sunrider-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L. Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Jacques Mizrahi, CEO
SwissJust
8308 NW 30 Terrace
Doral, FL 33122-1915
jm@swissjust.net

Re: Deceptive Income Claims Used to Market the SwissJust Business Opportunity

Dear Mr. Mizrahi:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that SwissJust is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-swissjust-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Bob Reina, CEO
Talk Fusion
1319 Kingsway Road
Brandon, FL 33510-2515
bob.reina@talkfusion.com

Re: Deceptive Income Claims Used to Market the Talk Fusion Business Opportunity

Dear Mr. Reina:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Talk Fusion is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-talk-fusion-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L. Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Julie Cabinaw, Vice President of Marketing
Tastefully Simple, Inc.
1920 Turning Leaf Lane, SW
Alexandria, MN 56308-4505
julie.cabinaw@tastefullysimple.com

Re: Deceptive Income Claims Used to Market the Tastefully Simple Business
Opportunity

Dear Ms. Cabinaw:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Tastefully Simple, Inc. is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-tastefully-simple-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Ekaterina Savva, Legal Counsel
The Avon Company
One Liberty Plaza
165 Broadway, 25th Floor
New York, NY 10006-1430
ekaterina.savva@avonusa.com

Re: Deceptive Income Claims Used to Market The Avon Company Business
Opportunity

Dear Ms. Savva:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that The Avon Company is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-the-avon-company-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L. Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Deb Walsh, Director of Marketing
Thirty-One Gifts
3425 Morse Crossing
Columbus, Ohio 43219
debwalsh@mythirtyone.com

Re: Deceptive Income Claims Used to Market the Thirty-One Gifts Business
Opportunity

Dear Ms. Walsh:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Thirty-One Gifts is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-thirty-one-gifts-income-claims-database/>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Francesca Ullram, Digital Marketing Manager
Touchstone Crystal, Inc.
1 Kenney Drive
Cranston, RI 02920-4403
francesca.ullram@touchstonecrystal.com

Re: Deceptive Income Claims Used to Market the Touchstone Crystal Business Opportunity

Dear Ms. Ullram:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Touchstone Crystal is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-touchstone-crystal-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Elisabeth Huijskens, Founder
Trades of Hope
4601 E. Moody Blvd Unit K-6
Bunnell, FL 32110-9009
elisabeth@tradesofhope.com

Re: Deceptive Income Claims Used to Market the Trades of Hope Business
Opportunity

Dear Ms. Huijskens:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Trades of Hope is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-trades-of-hope-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Christina Bondola, Marketing and Communications Manager
Traveling Vineyard
127 High Street
Ipswich, MA 01938-1238
christine@travelingvineyard.com

Re: Deceptive Income Claims Used to Market the Traveling Vineyard Business Opportunity

Dear Ms. Bondola:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Traveling Vineyard is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-traveling-vineyard-income-claims-database/>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L. Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Karen Sheehan, Chief Legal Officer
Tupperware
14901 S Orange Blossom Trail
Orlando, FL 32837
karensheehan@tupperware.com

Re: Deceptive Income Claims Used to Market the Tupperware Business Opportunity

Dear Ms. Sheehan:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Tupperware is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-tupperware-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Joshua Foukas, General Counsel
USANA Health Sciences, Inc.
3838 West Parkway Boulevard
Salt Lake City, Utah 84120
Joshua.Foukas@usanainc.com

Re: Deceptive Income Claims Used to Market the USANA Health Sciences, Inc.
Business Opportunity

Dear Mr. Foukas:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that USANA Health Sciences, Inc. is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-usana-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L. Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Jason Brady, Chief Legal and Compliance Officer
Vector Marketing
P.O. Box 1228
Olean, NY 14760-3814
jason.brady@vectorsolutions.com

Re: Deceptive Income Claims Used to Market the Vector Marketing Business Opportunity

Dear Mr. Brady:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Vector Marketing is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-vector-income-claims-database/>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L. Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Ron Sacka, Chief Marketing Officer
Vida Divina
1819 Excise Avenue
Ontario, CA 91761
sacka@vidadivina.com

Re: Deceptive Income Claims Used to Market the Vida Divina Business Opportunity

Dear Mr. Sacka:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Vida Divina is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-vida-divina-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L. Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Elizabeth Armstrong, Director of Marketing
Vollara, LLC
14841 Dallas Pkwy, Ste 500
Dallas, TX 75254-7689
elizaabeth.anding@vollara.com

Re: Deceptive Income Claims Used to Market the Vollara Business Opportunity

Dear Ms. Armstrong:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Vollara is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-vollara-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Lauren Howes, Director of Marketing
WineShop At Home
560 Technology Way
Napa, CA 94558-7513
lhowes@wineshopathome.com

Re: Deceptive Income Claims Used to Market the WineShop At Home Business Opportunity

Dear Ms. Howes:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that WineShop At Home is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-wineshop-at-home-income-claims-database/>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Chris Crump, General Counsel
Xyngular
2000 Ashton Blvd., Suite 500
Lehi, UT 84043
chris.crump@xyngular.com

Re: Deceptive Income Claims Used to Market the Xyngular Business Opportunity

Dear Mr. Crump:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Xyngular is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-xyngular-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L. Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

YOR Health
2802 Kelvin Ave., #150
Irvine, CA 92614-5898
info@yorcorp.com

Re: Deceptive Income Claims Used to Market the YOR Health Business Opportunity

Dear Sir or Madam:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that YOR Health is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-yor-health-income-claims-database/>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L. Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Kevin McMurray, General Counsel
Young Living
3400 Mayflower Ave
Lehi, UT 84043-3261
kcmurray@youngliving.com

Re: Deceptive Income Claims Used to Market the Young Living Business
Opportunity

Dear Mr. McMurray:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Young Living is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-young-living-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L. Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org



February 14, 2024

VIA EMAIL AND REGULAR MAIL

Jay Shafer, CEO
Zurvita
840 W. Sam Houston Pkwy
N. Suite 300
Houston, TX 77024-4612
jshafer@zurvita.com

Re: Deceptive Income Claims Used to Market the Zurvita Business Opportunity

Dear Mr. Shafer:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. As a follow-up to our 2017 examination of inappropriate earnings claims made by multilevel marketing companies, we recently investigated 100 MLM companies (93 Direct Selling Association member companies, as well as seven additional MLMs) and found that 98 percent of these companies (and/or their divisions) have made atypical and unsubstantiated income claims to promote their business opportunities. *See* <https://truthinadvertising.org/industries/mlm-companies-income-claims/>.

Such atypical claims catalogued by TINA.org range from earning supplemental income to achieving financial freedom, and can be found across the internet, including on social media platforms. We found that Zurvita is one of the companies at issue. A database containing a sampling of inappropriate income claims can be found here: <https://truthinadvertising.org/evidence/2023-zurvita-income-claims-database>.

I trust that immediate action will be taken to remove these unsubstantiated income claims, as well as further efforts to ensure that no future misrepresentations are made. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'L. Smith'.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc via email: Joseph Mariano, President
Direct Selling Association
jmariano@dsa.org

Peter Marinello, Vice President
Direct Selling Self-Regulatory Council
pmarinello@bbbn.org