



March 11, 2020

VIA EMAIL AND OVERNIGHT MAIL

Peter C. Marinello, Director
Howard J. Smith
Direct Selling Self-Regulatory Council
112 Madison Avenue, 3rd floor
New York, NY 10016
pmarinello@bbbn.org
hsmith@bbbn.org

Re: Le-Vel Brands, LLC's Use of Illegal Income and Health Claims to Promote the "Thrive Experience"

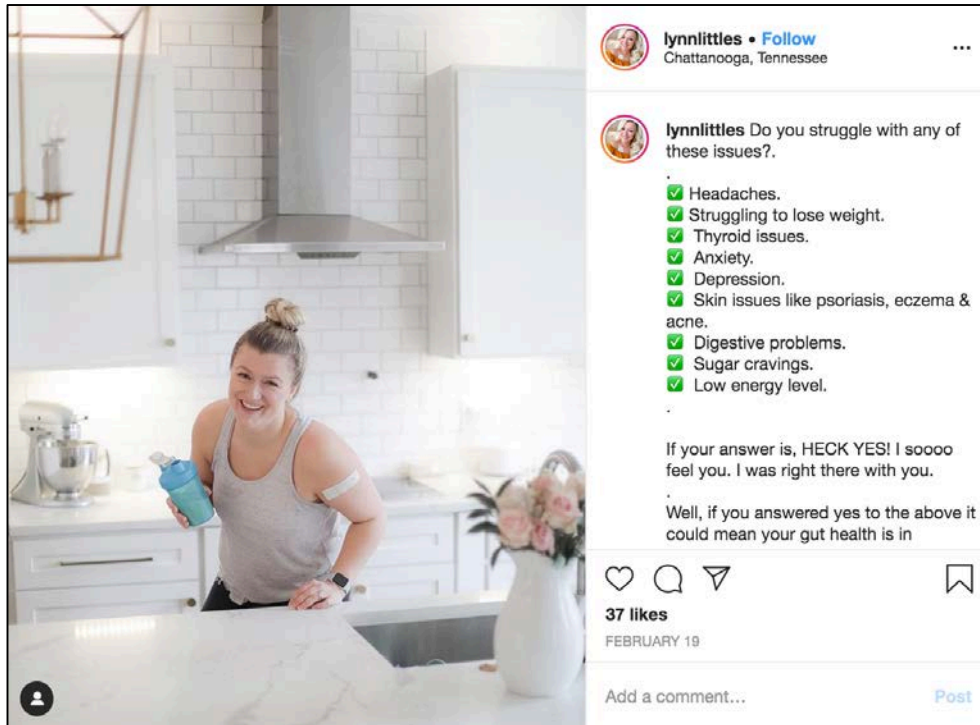
Dear Peter and Howard:

We write to file a complaint with the Direct Selling Self-Regulatory Council against Le-Vel Brands, LLC, a Texas-based multi-level marketing company that has been using – and continues to use – unsubstantiated, and therefore deceptive, health and disease-treatment claims to market its flagship product line of supplements, shakes, and patches, known collectively as the Thrive experience, as well as unsubstantiated and exaggerated income claims to market its business opportunity.¹

Unsubstantiated Health and Disease-Treatment Claims

Le-vel, directly and through its distributors, is – and has been for years – using deceptive and unsubstantiated health and disease-treatment claims to sell Thrive products. TINA.org has compiled more than 50 examples of unsubstantiated health and disease-treatment claims made about Thrive products, such as being able to treat, cure, or

alleviate the symptoms of anxiety, depression, thyroid issues, the flu, multiple sclerosis, psoriasis, eczema, and diabetes, to name a few.



lynnettles • Follow
Chattanooga, Tennessee

lynnettles Do you struggle with any of these issues? .

- ✔ Headaches.
- ✔ Struggling to lose weight.
- ✔ Thyroid issues.
- ✔ Anxiety.
- ✔ Depression.
- ✔ Skin issues like psoriasis, eczema & acne.
- ✔ Digestive problems.
- ✔ Sugar cravings.
- ✔ Low energy level.

If your answer is, HECK YES! I sooooo feel you. I was right there with you. .

Well, if you answered yes to the above it could mean your gut health is in

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dchuva • Follow

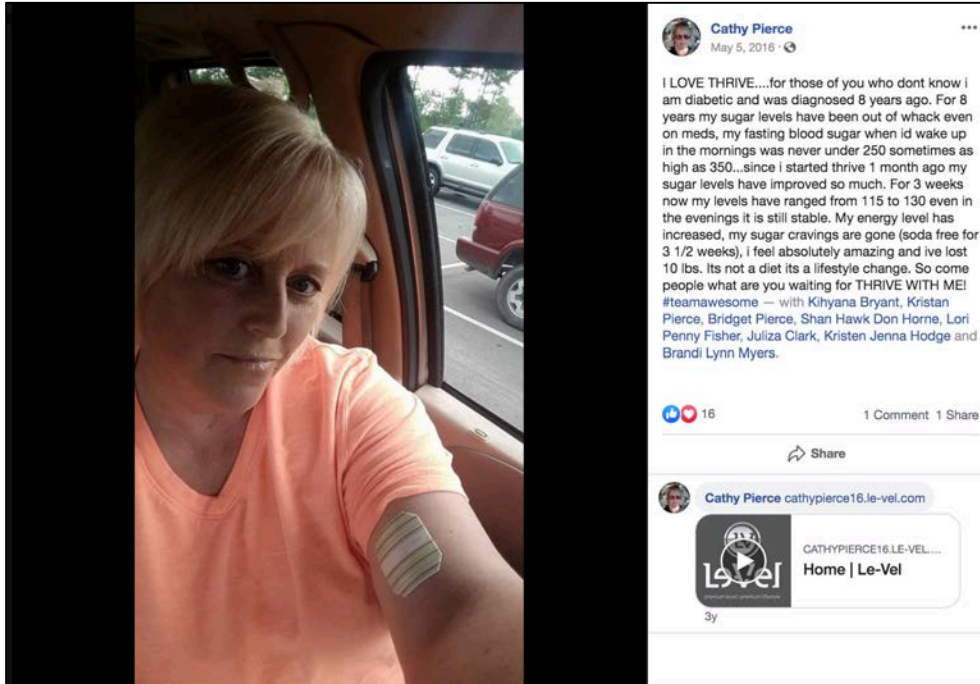
dchuva Well ... Monday I came home from an amazing best friend cruise that my roommate ended up having the flu ... then the rest of the week we've been to the vet to get the dogs shots and meds for poor cypress for his allergies ... the dr twice for one child that has Flu A and the other with a cough but thank God no flu... but still no leaving the house so had to miss soccer 🙄 We missed Jason Aldean but were able to gift our tickets to friends that deserved a date night .. so right now friends .. we cheers to the THRIVE EXPERIENCE bc without it I doubt we would have avoided the flu , the cough or the chaos !! #fluA #notustho #thrivegotourback #thrive #dft #momof3

4w

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The 50+ examples of unsubstantiated disease-treatment claims are all available at <https://www.truthinadvertising.org/thrive-health-claims-database/> and on the enclosed flash drive.

Unsubstantiated Income Claims

Le-Vel and its distributors are also using deceptive, atypical, and unsubstantiated income claims regarding the financial gains consumers will achieve by becoming distributors. For example, Le-Vel advertises that its distributors can become millionaires, get out of debt, go on extravagant vacations, and drive luxury cars, among other things. Not only are such claims frequently made by Le-Vel distributors, but they are also made directly by the company. For example, in a February 2020 video published on the company's YouTube channel,⁵ Le-Vel co-CEOs Paul Gravette and Jason Camper discuss the benefits of the company and its compensation program while the following images of Le-Vel distributors on vacation and holding "millionaire" signs are shown on the screen:



Le-Vel's Jason Camper & Paul Gravette

2,718 views • Feb 10, 2020

103 1 SHARE SAVE ...



Le-Vel's Jason Camper & Paul Gravette

2,718 views • Feb 10, 2020

103 1 SHARE SAVE ...

Another Le-Vel video, which is published on the company's website, as well as on its YouTube channel,⁶ tells consumers that people are “accomplishing their financial goals by choosing to promote the [Thrive] experience,” while the following images appear on the screen:



And as the screen shots below show, Le-Vel distributors use the same deceptive tactics to lure others into the business.



em.hening • Follow
Oklahoma City, Oklahoma

em.hening I don't know how to even begin writing this. ☐
Today at noon I officially hit the millionaires club, making me the youngest person in company history to earn a million dollars in commissions 🥳

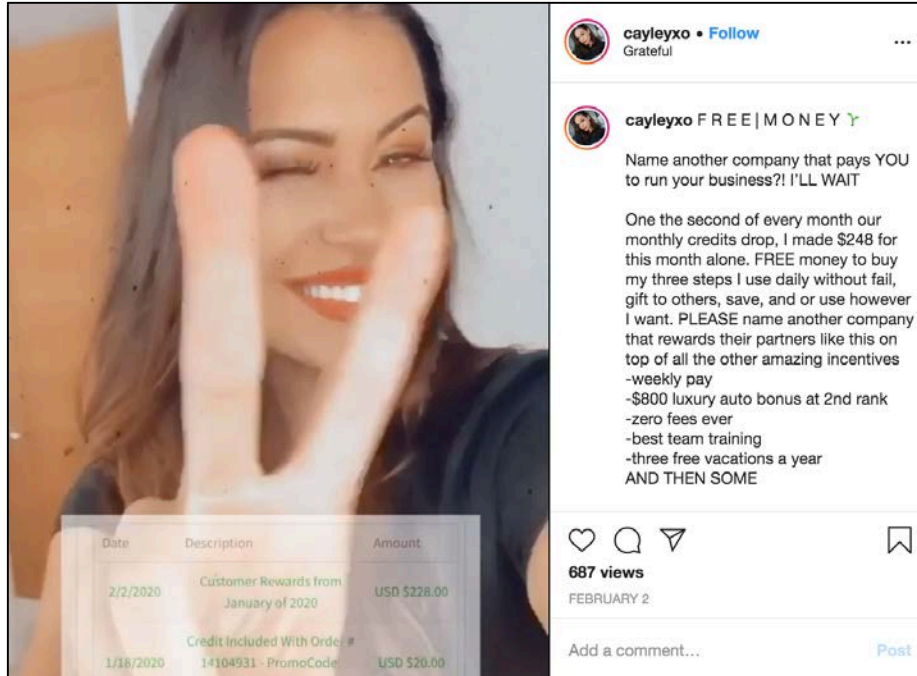
Just over two years ago I joined this company completely broken, broke & lost with no idea how to pull myself out of the hole I was in. What I didn't know is that god had a plan and purpose for my • YES • and he was about to show just mighty and powerful his love truly is.

Today isn't monumental because I want to hold the title of being a millionaire; it's because of what that million dollars represents.
For us to be able to bring in that much

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8



9

The above posts are typical of the 140 examples of Thrive marketing materials that make exaggerated and deceptive income claims, which are all available at <https://www.truthinadvertising.org/thrive-income-claims-database/> and on the enclosed flash drive. Put simply, the internet is littered with these types of income claims.

As such, TINA.org strongly urges the DSSRC to review the claims being made by Le-Vel and its distributors to promote the Thrive product line and business opportunity, and take appropriate action.

If you have any questions, please do not hesitate to contact us.

Sincerely,



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



Bonnie Patten, Esq.
Executive Director
Truth in Advertising, Inc.

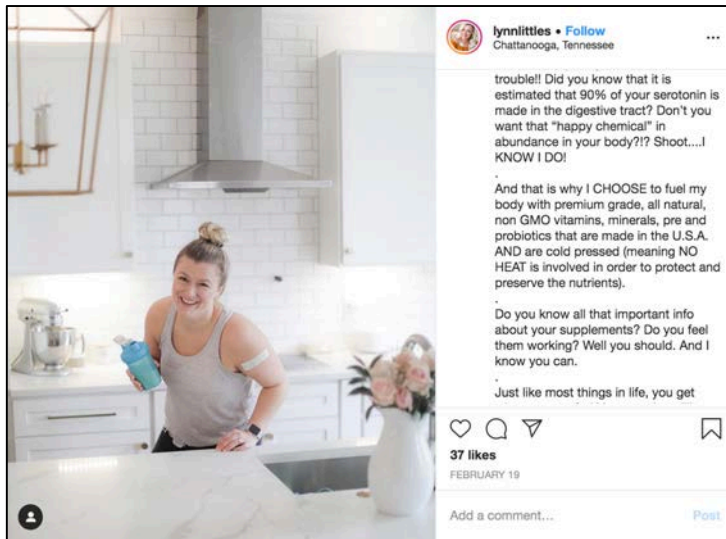
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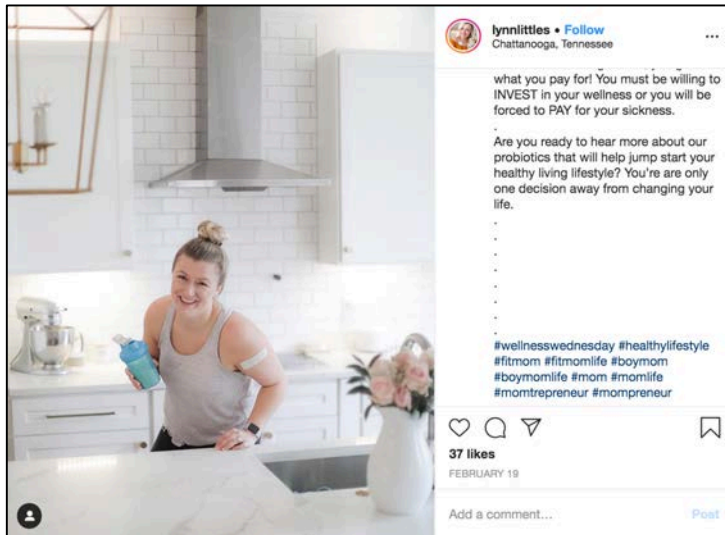
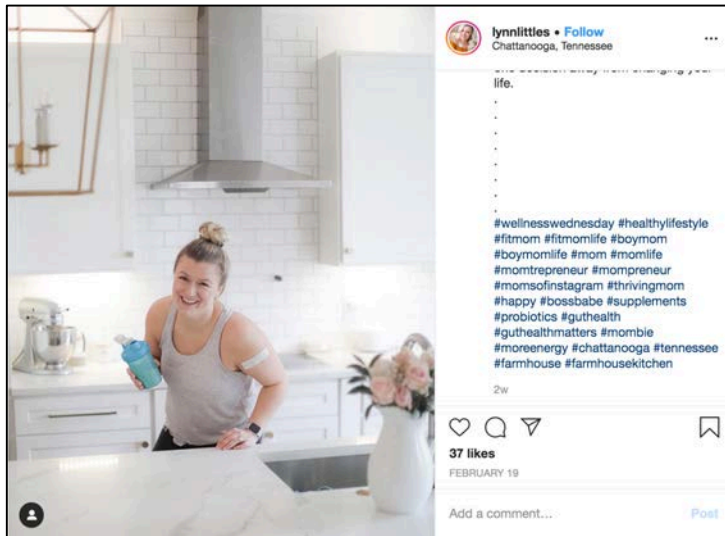
¹ Le-Vel Brands has been the subject of more than 170 complaints to the BBB, apparently prompting the BBB in June 2018 to request the company’s “voluntary cooperation in eliminating identified patterns of consumer complaints.” See <https://www.bbb.org/us/tx/frisco/profile/vitamins-and-supplements/le-vel-0875-90405051>. As of March 11, 2020, however, the company has an A+ BBB rating.

In addition, the U.S. Food and Drug Administration has received more than a dozen adverse health reports concerning Thrive products since 2013. See https://www.truthinadvertising.org/wp-content/uploads/2016/02/Thrive-adverse-event-reports_Redacted.pdf; <https://www.truthinadvertising.org/what-you-should-know-about-thrive/>.

And in the United Kingdom, the company has been the subject of an Advertising Standards Authority investigation, which found the company was violating the ASA’s advertising code. See <https://www.truthinadvertising.org/wp-content/uploads/2015/08/ASA-Ruling-on-Le-Vel.pdf>.

² <https://www.instagram.com/p/B8xO1KpgvH8/>. Full caption shown below:





³ <https://www.instagram.com/p/B8CQatJBWu7/>.

⁴ This post was published in 2016 (and is still up today), showing that Thrive has been making disease-treatment claims for years.
<https://www.facebook.com/photo.php?fbid=10207796021592306&set=a.1753504511228&type=3&theater>.

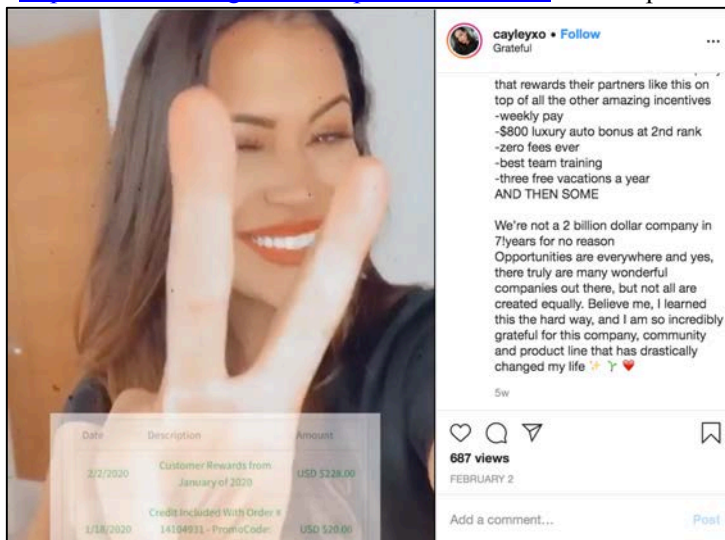
⁵ https://www.youtube.com/watch?v=S_F1UtpXUjA.

⁶ <https://le-vel.com/#home-experience>;
https://www.youtube.com/watch?time_continue=1&v=W_gyx77VEjw&feature=emb_logo.

7 <https://www.instagram.com/p/B8uHb4RFs5b/>. Full caption shown below:



8 <https://www.instagram.com/p/B8FoVi4JXIP/>. Full caption shown below:



9 <https://www.instagram.com/p/B8H5NiWIN7/> . Full caption shown below:



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Yukon, Oklahoma

A reality to this day that shocks me to my core
Did I get lucky?
Was it a once in a million chance?
No & No
For me to be able to help others accomplish these things, I had to walk first. And I truly believe that's why things unfolded the way they did.
I had already been in this industry for two years. I had put in the foot work. Built the foundation. But I had to listen when I was led to the opportunity that would allow me to serve others.

We accomplished all of those things over a year and a half ago, and everything has grown immensely since then. But I still remember the girl who sat on the bedroom floor with a white board and a marker and told herself to

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• Dream Board •
- make 10k / month
- all bills paid in 1st paycheck
- bring travis home
- pay off travis debt
- pay off my debt
- 10k in savings
- give back each
- spoil my team
- pay someone else's bills
- support 5 small business / month



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dream as big as she possibly could.
Write out your wildest dreams.

I say this to help you realize that the plans he has for you are greater than you could EVER imagine or conjure up on your own. He's just waiting for you to surrender to him so he can guide you. He's waiting for you to take one step forward.
I pushed against my gut and heart for so long. I ignored every sign I was sent. I thought I could execute the perfect plan on my own. But I couldn't, and I didn't.
It took stepping out in extreme fear and saying "I trust you" to change our entire lives. And I can sit here and say now that life isn't about the accomplishments you will have, it's the lives you will be able to impact.

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em.hening • Follow
Yukon, Oklahoma

plan on my own. But I couldn't, and I didn't.
It took stepping out in extreme fear and saying "I trust you" to change our entire lives. And I can sit here and say now that life isn't about the accomplishments you will have, it's the lives you will be able to impact.
But to do that sis, you've gotta get your head about water first. Help yourself so you can help others. Don't spend another day afraid to write those dreams out or stepping in the direction you know you need to.
You can do this. ♥

4w

1,565 likes
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• Dream Board •
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- pay off travis debt
- pay off my debt
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