



October 16, 2019

Peter C. Marinello, Director
Howard J. Smith, Attorney
Direct Selling Self-Regulatory Council
112 Madison Avenue, 3rd Floor
New York, NY 10016



Re: Illegal Health Claims by dōTERRA International, LLC

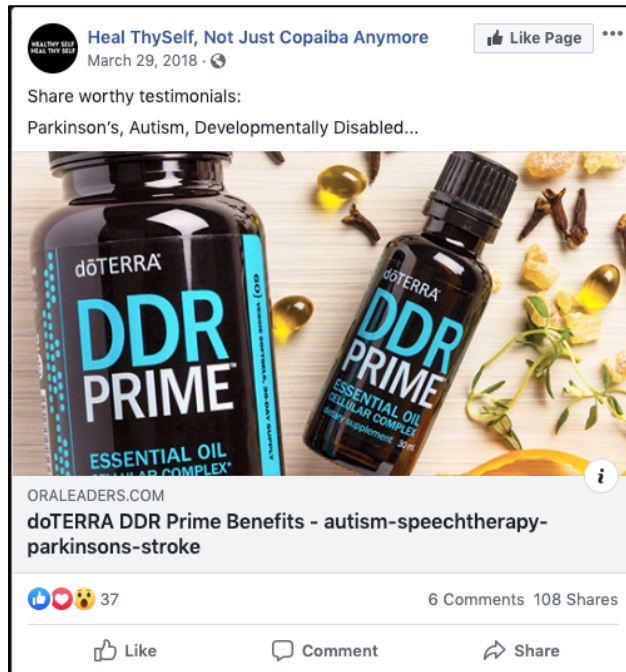
Dear Peter and Howard:

dōTERRA International, LLC (“doTerra”), a Utah-based multi-level marketing company well-known for selling essential oils,¹ has been using – and continues to use – unsubstantiated, and therefore deceptive, health and disease-treatment claims to market its products. Such claims – made both expressly and implicitly – include representations that doTerra’s essential oils can treat or alleviate the symptoms of ADHD, diabetes, PTSD, autism, fibromyalgia, IBS, epilepsy, gout, bronchitis, insomnia, endometriosis, and arthritis, to name a few. TINA.org has collected a sampling of more than 140 examples of such deceptive claims made by doTerra’s distributors, which are available at <https://www.truthinadvertising.org/doterra-database/> and on the enclosed flash drive.

Alarming, the vast majority of these claims were made *after* doTerra received a warning letter from the U.S. Food and Drug Administration, admonishing doTerra’s use

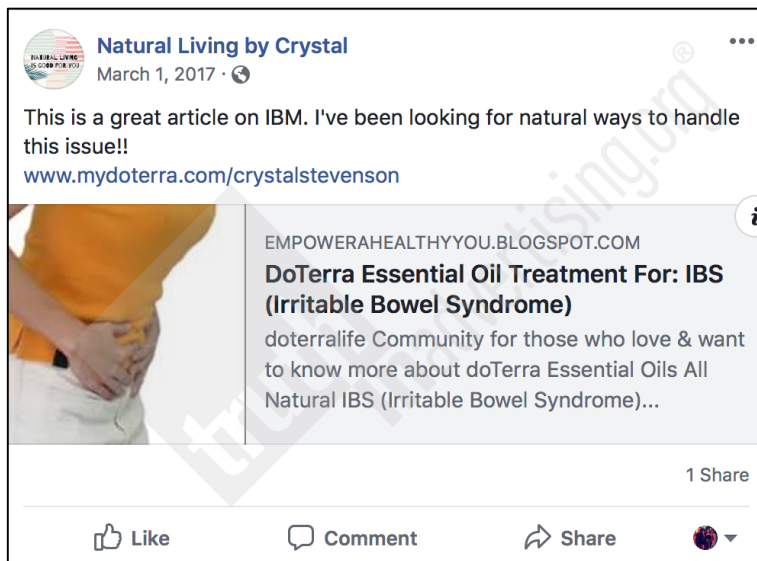
of disease-treatment claims to market its products, none of which are FDA-approved drugs.²

For example, there are some doTerra marketing materials promoting the essential oils' ability to alleviate or treat the symptoms of autism:³



Others claim that they can treat IBS,⁴ epilepsy,⁵ lupus,⁶ PTSD,⁷ and even cancer.⁸

For example:



Jan Patterson Empowered by Oils for life, Jan Patterson, Wellness Advocate, MI
June 1 · 🌐

PTSD treated naturally....WHAT?!?! Thank God for doTERRA!!

This is an amazing testimony of one man's triumph in overcoming PTSD. WOW! What an incredible story of hope and perseverance...

"Many of you may already know that I had some issues, both physically and mentally, after returning from Afghanistan. Finally cleaned out my prescription shelf. The mess of bottles and boxes is where I was two years ago. The bottom is where I'm at now. Which would you choose? Thanks doTERRA."

What is your health worth to you?!"

- Tyler Tripp

PhotoGrid

👍❤️👍 3 5 Comments 2 Shares

👍 Like ➦ Share

Some doTerra promotional posts – which claim the company's essential oils can treat diabetes⁹ and ADHD¹⁰ – have been on the internet for more than five years and are still in publication today:

Arlington, TX Events
@Arlington_event Follow

Diabetes & doTerra Essential Oils Class:
Learn how to reverse Type II Diabetes and other diseases with doTerra...
tsciti.es/1hmuCFw

10:19 PM - 23 Apr 2014

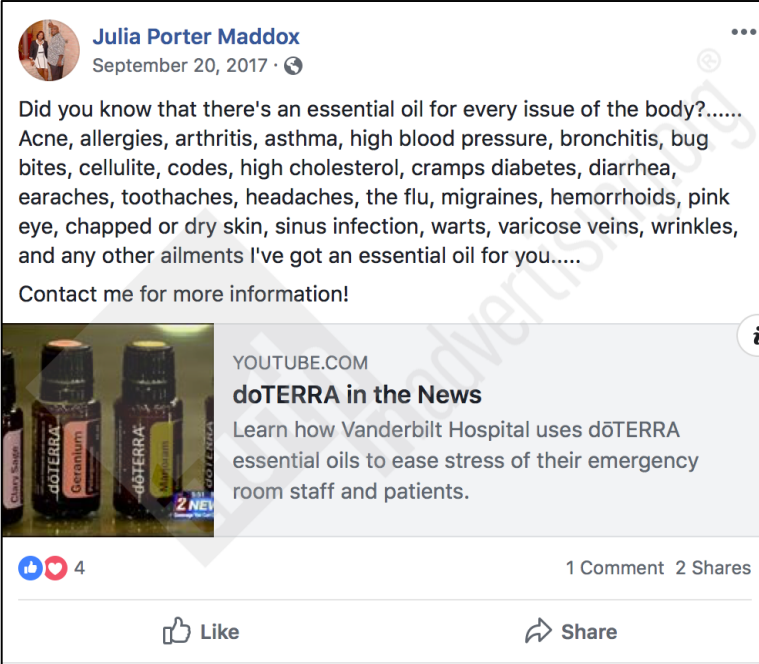
annalaura brown
@annalaurabrown Follow

ow.ly/i/YHt7 Learn about Doterra's new blend for ADD/ADHD and for focus and concentration. fb.me/21altuamf

8:33 AM - 4 Oct 2012

Megan @SavvyLivingGal · 4 Oct 2012
Replying to @annalaurabrown
@annalaurabrown I'm totally getting this on my LRP this month!!!

Certain doTerra marketing materials are broader and treat essential oils as a cure-all, making multiple disease-treatment claims:¹¹



A screenshot of a Facebook post by Julia Porter Maddox, dated September 20, 2017. The post text reads: "Did you know that there's an essential oil for every issue of the body?..... Acne, allergies, arthritis, asthma, high blood pressure, bronchitis, bug bites, cellulite, codes, high cholesterol, cramps diabetes, diarrhea, earaches, toothaches, headaches, the flu, migraines, hemorrhoids, pink eye, chapped or dry skin, sinus infection, warts, varicose veins, wrinkles, and any other ailments I've got an essential oil for you..... Contact me for more information!". Below the text is a video thumbnail showing several doTerra essential oil bottles. The video title is "doTERRA in the News" and the description says "Learn how Vanderbilt Hospital uses dōTERRA essential oils to ease stress of their emergency room staff and patients." The post has 4 likes, 1 comment, and 2 shares.



A screenshot of a tweet from doTERRA Oils (@doTERRAshop) dated 11:26 PM on March 11, 2012. The tweet text reads: "Who knew natural essential oils from doTERRA could treat ear infections, strep, viral infection (yes viral!), ADHD, Autism...SAFE FOR KIDS!". The tweet includes icons for reply, retweet, and like.

And many doTerra ads target women, claiming doTerra oils can treat endometriosis, PMS, and menopause:¹²

Endometriosis Support
Wellness Advocate Cassandra Stephens

- Balance Hormones
Relieve Discomfort
clarycalm
Monthly Blend for Women
- Balance Hormones
Balance Endocrine System
Yung Yang
Candida Support
- Pain and Inflammation
Stress Reduction
Frankincense
Boswellia Essential Oil
- Pain and Inflammation
Copaliba
Copaliba Essential Oil
- Pain, Inflammation
Balance Sugar Levels
Slim & Sassy
Metabolic Blend

Wellness Advocate Cassandra Stephens
Like This Page · August 4 · 🌐

I live with endometriosis but endometriosis doesn't have control over me! Thank you to my Nutritionist, Board Certified Homeopathic Dr. and Thermographer I learned how to manage my pain, bloating, mood, cycle EVERYTHING with the proper food, essential oils and supplements! 🙌

doTERRA'S LifeLong Vitality is my daily vitamin and seriously kicks my endometriosis in the butt hard! I really cannot go without it! These essential oils are my daily go-to's to keep symptoms at bay entirely or if I've been bad with my diet (sugar, dairy and gluten are no no's for endometriosis but irresistible at times) then these essential oils give me immediate relief!

👉 These right here are game changers! I don't really suffer from endometriosis anymore thanks to all my natural solutions. While there is no cure for this disease I am totally happy knowing I can eliminate all the issues that come along with it!

Write a comment...

Mallee Essentials
Like This Page · July 21 · 🌐

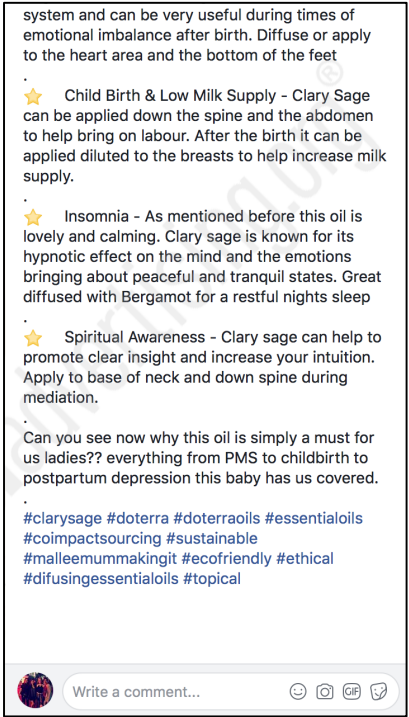
CLARY SAGE - THE OIL OF CLARITY & VISION

Clary sage has quite a distinct aroma, its musky and feminine which gives you the clue that it may be good for us ladies. This beautiful oil is steeped in history for uses with all female complaints everything from period pain to childbirth to depression.

Let me introduce you to some of the uses of this gorgeous oil

- ★ Endometriosis - Clary sage has been reported to help to regulate oestrogen imbalances and has been reported to reduce symptoms of endometriosis. Apply diluted topically
- ★ PMS & Menopause - Again due to its ability to regulate oestrogen, Clary Sage can be helpful during PMS & Menopause. Apply topically diluted to abdomen & bottom of the feet
- ★ Hot Flushes - Combine in water with peppermint in a spray bottle and spray on back of neck for a lovely cooling effect
- ★ Post Partum Depression & Anxiety - Clary Sage has a lovely calming effect on the nervous system and can be very useful during times of

Write a comment...



doTerra promoters also target parents. One “essential oils consultant” has built a business on just that. This consultant explained that she “was completely blown away” by the “effectiveness in both prevention of illness and the[] healing properties” of essential oils on her “new baby” and, “[a]s a result, she has focused her business on teaching parents how to keep everyone in the family happy and healthy with the use of doTERRA 100% certified pure therapeutic grade essential oils!”¹³ And she’s not the only one, as many doTerra marketing materials similarly try to encourage parents to use essential oils in the place of antibiotics or over the counter medicines:¹⁴



The above examples are merely a handful of the more than 140 collected by TINA.org that make unsubstantiated health and disease-treatment claims.

In short, doTerra has been aware of this deceptive marketing issue for years but has failed to put an end to it, while consumers continue to be deceived, some of whom may be induced to use these essential oils in lieu of physician-recommended medications for serious health conditions.¹⁵ The resulting harm cannot be understated. Accordingly, TINA.org strongly urges the DSSRC to review the health claims by doTerra and its distributors and take appropriate action.

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

Sincerely,

Laura Smith, Esq., Legal Director
Michael Springer, Esq., Attorney
Truth in Advertising, Inc.
Encl.

¹ doTerra also sells supplements, personal hygiene and skincare products, and other health products.

² FDA Warning Letter to doTerra, dated Sept. 22, 2014, <https://www.fda.gov/inspections-compliance-enforcement-and-criminal-investigations/warning-letters/doterra-international-llc-09222014>.

³ doTerra March 29, 2018 Facebook post, <https://www.facebook.com/checkUroil/posts/351866101970648> (also available at https://www.truthinadvertising.org/wp-content/uploads/2019/10/Doterra-facebook-3_29_18-wm.png).

⁴ doTerra March 1, 2017 Facebook post, https://www.facebook.com/naturallivingbycrystal/posts/1277391759022074?_tn=-R (also available at https://www.truthinadvertising.org/wp-content/uploads/2019/10/Doterra-facebook-3_01_17-wm.png).

⁵ doTerra June 22, 2018 Facebook post, <https://www.facebook.com/photo.php?fbid=10213434216104796&set=a.1624282481909&type=3&theater> (also available at https://www.truthinadvertising.org/wp-content/uploads/2019/10/Doterra-facebook-6_22_18b-wm.png).



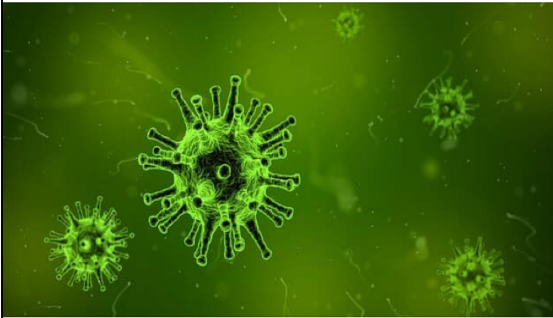
⁶ doTerra June 24, 2019 Facebook post, <https://www.facebook.com/groups/earthgifts4u/permalink/875584399477762/> (also available at https://www.truthinadvertising.org/wp-content/uploads/2019/10/Doterra-facebook-6_24_19-wm.png).

Samantha Ellen Smith • doTERRA 24/7
 June 24 at 10:50 PM · 🌐

LUPUS – Combat inflammation and pain with ESSENTIAL OILS

Lupus is an autoimmune disease which is chronic in nature. This means its symptoms are present for a minimum of 6 weeks, and often have been a problem for years. Lupus can affect any organ or joint, the skin, and other body parts. What happens is a weakening of the immune system. Lupus damages your body's natural immunity against viruses and bacteria, germs and other foreign invaders.

- Lavender – The lavender aroma is added to perfumes and household cleaners. It is a positively calming and stress-relieving sent which has been used in aromatherapy for many centuries. One of the most scientifically studied essential oils, lavender oil promotes a healthy sleep cycle and calm relief from stress and anxiety, proven tactics for reducing the impact of the inflammation and pain often experienced with lupus.
- Geranium – Geranium oil has cicatrisant benefits. This means geranium oil dramatically increases the circulation of blood. When it does this just below the surface of the skin, it can help acne, wounds, cuts and other skin irritations heal rapidly. This property is what makes geranium oil so good for helping to minimize the trademark rashes that are present with lupus.
- Helichrysum – This essential oil has powerful anti-inflammatory properties. Inflammation is one of the principal characteristics of lupus, a cornerstone trait of the disease which causes chronic pain and immobility. Helichrysum oil has also shown antioxidant and free radical-fighting properties in multiple studies, and works as an effective pain-reliever in joints, muscle and tissues.




👍👎 5 6 Comments 2 Shares

👍 Like ➦ Share

⁷ doTerra June 1, 2019 Facebook post, <https://www.facebook.com/groups/646224168736008/permalink/2981548278536907/> (also available at https://www.truthinadvertising.org/wp-content/uploads/2019/10/Doterra-facebook-6_01_19-wm.png).

⁸ doTerra July 9, 2018 Facebook post, <https://www.facebook.com/kylie.noelsmith/posts/10214984902123298> (also available at https://www.truthinadvertising.org/wp-content/uploads/2019/10/Doterra-facebook-7_09_18bi-wm.png; https://www.truthinadvertising.org/wp-content/uploads/2019/10/Doterra-facebook-7_09_18bii-wm.png; https://www.truthinadvertising.org/wp-content/uploads/2019/10/Doterra-facebook-7_09_18biii-wm.png).

<p> Kylie Noel July 9 · 🌐</p> <p>doTERRA tip: CANCER SUPPORT DoTerra Essential Oil Support For: Cancer</p> <p>Cancer is the general name for a group of more than 100 diseases in which cells in a part of the body begin to grow out of control. Although there are many kinds of cancer, they all start because abnormal cells grow out of control. Untreated cancers can cause serious illness and even death.</p> <p>Cancer grows out of normal cells in the body. Normal cells multiply when the body needs them, and die when the body doesn't need them. Cancer appears to occur when the growth of cells in the body is out of control and cells divide too quickly. It can also occur when cells forget how to die.</p> <p>There are many different kinds of cancers. Cancer can develop in almost any organ or tissue, such as the lung, colon, breast, skin, bones, or nerve tissue.</p> <p>A cancer diagnosis is difficult to cope with, however, there are many successful cures, treatments, and even support groups to help.</p> <p>Cancer cells often travel to other parts of the body, where they begin to grow and form new tumors that replace normal tissue. This process is called metastasis. It happens when the cancer cells get into the bloodstream or lymph vessels of our body.</p> <p>We do not suggest that you forgo any current medical plan that is working in your or a loved ones cancer treatment. However, adding the essential oils to the treatment can yield quick and powerful results.</p> <p>doTERRA Essential Oils work perfectly with the body to support normal functions of the body and doTERRA products are safe to use on all ages.</p> <p>===</p> <p>doTERRA Essential Oil Users Have Found The Following To Assist In Cancer Support:</p> <p>General Support For All Cancers: Frankincense Oil, Sandalwood Oil, and Rosemary Oil Balance Oil Blend</p> <p>—</p> <p>Bone Cancer Support: In addition to the above General Cancer Support... White Fir Oil & Lemon Oil</p> <p>—</p> <p>Brain Cancer Support : In addition to the above General Cancer Support... Clove Oil , Thyme Oil Myrrh Oil</p> <p>—</p> <p>Breast Cancer Support:</p>	<p>Breast Cancer Support: In addition to the above General Cancer Support... Marjoram Oil, Oregano Oil, Cassia, Cinnamon Oil, Lemongrass Oil Lemon Oil</p> <p>—</p> <p>Cervical Cancer Support: In addition to the above General Cancer Support... Thyme Oil, Vetiver Oil, White Fir</p> <p>—</p> <p>Colon Cancer Support: In addition to the above General Cancer Support... Clove Oil, Ginger Oil, Geranium Oil , Lemongrass Oil</p> <p>—</p> <p>Leukemia Support: In addition to the above General Cancer Support... Clary Sage Oil, Lemongrass Oil, Cypress Oil and Lemongrass Oil</p> <p>—</p> <p>Liver Cancer Support: In addition to the above General Cancer Support... Cassia Oil, Lavender Oil, Zendocrine Oil Blend, Geranium Oil , Lemongrass Oil</p> <p>—</p> <p>Lung Cancer Support: In addition to the above General Cancer Support... Peppermint Oil, Breathe Oil Blend, Lemon Oil</p> <p>—</p> <p>Prostate Cancer Support: In addition to the above General Cancer Support... Oregano Oil, Cassia Oil, Cinnamon Oil, Zendocrine Oil , Lemongrass Oil</p> <p>—</p> <p>Skin Cancer Support: In addition to the above General Cancer Support... Oregano Oil, Melissa Oil, Lemongrass Oil, Geranium Oil</p> <p>—</p> <p>Throat Cancer Support: In addition to the above General Cancer Support... Cinnamon Oil, Thyme Oil, Lemon Oil, Myrrh Oil</p> <p>—</p> <p>Uterine Cancer Support: In addition to the above General Cancer Support... Clary Sage Oil, Geranium Oil, On Guard Oil Blend</p> <p>===</p> <p>Additional Help: -Take Life Long Vitality Vitamins daily</p>
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⁹ doTerra April 23, 2014 Twitter post, https://twitter.com/Arlington_event/status/459199833354407936 (also available at https://www.truthinadvertising.org/wp-content/uploads/2019/10/Doterra-twitter-4_23_14-wm.png).

¹⁰ doTerra October 4, 2012 Twitter post, <https://twitter.com/annalaurabrown/status/253880406653431808> (also available at https://www.truthinadvertising.org/wp-content/uploads/2019/10/Doterra-twitter-10_04_12-wm.png).

¹¹ doTerra September 20, 2017 Facebook post, https://www.facebook.com/jpmaddox/posts/10155513303416327?_tn_=-R (also available at https://www.truthinadvertising.org/wp-content/uploads/2019/10/Doterra-facebook-9_20_17-wm.png); doTerra March 11, 2012 Twitter post, <https://twitter.com/doTERRAshop/status/179090973492641792> (also available at https://www.truthinadvertising.org/wp-content/uploads/2019/10/Doterra-twitter-3_11_12-wm.png). *See also* doTerra August 31, 2018 Facebook post,

<https://www.facebook.com/doterrainternational/photos/a.831920193528312/1798174016902920/?type=3&theater> (also available at https://www.truthinadvertising.org/wp-content/uploads/2019/10/Doterra-facebook-8_31_18ai-wm.png; https://www.truthinadvertising.org/wp-content/uploads/2019/10/Doterra-facebook-8_31_18aii-wm.png).

Everything Essential Oils
Like This Page · August 31 ·

So far on our beautiful journey sharing doTERRA Essential Oils we have supported 1000s of customers that fall into the category of having a NCD

💧 NCD means Non-Communicable Diseases & they account for 78% of all diseases and 86% deaths worldwide, approximately 36 million annually! STAGGERING right..

💧 What actually are NCDs?
They are non-infectious diseases or medical conditions, they tend to be chronic (long lasting) diseases with slow progression. They are usually not passed on from one affected person to others, but are mostly CAUSED as a DIRECT RESULT of LIFESTYLE and ENVIRONMENTAL factors!

💧 A few Examples of NCDs include: Alzheimer's Asthma Cataracts Chronic Kidney Disease Chronic Lung Disease Diabetes Fibromyalgia Heart Disease Hypertension (High Blood Pressure) Obesity Osteoporosis Stroke Cancer Several other cardiovascular diseases

💧 Unfortunately the general practice of medicine is still focused on Sick care rather than health care! And Only 3% (approx) of health spending is allocated to prevention and lifestyle.

So this is where we come in with doTERRA?

Write a comment...

¹² doTerra August 4, 2018 Facebook post, <https://www.facebook.com/1625720757651237/photos/a.1626385320918114/2134633260093315/?type=3&theater> (also available at https://www.truthinadvertising.org/wp-content/uploads/2019/10/Doterra-facebook-8_04_18i-wm.png; https://www.truthinadvertising.org/wp-content/uploads/2019/10/Doterra-facebook-8_04_18ii-wm.png); doTerra July 21, 2018 Facebook post, <https://www.facebook.com/mallee.essentials/photos/a.220239501802612/231534140673148/?type=3&theater> (also available at https://www.truthinadvertising.org/wp-content/uploads/2019/10/Doterra-facebook-7_21_18i-wm.png; https://www.truthinadvertising.org/wp-content/uploads/2019/10/Doterra-facebook-7_21_18ii-wm.png).

¹³ <http://www.newmommymedia.com/experts/rachel-adams-gonzales/> (also available at <https://www.truthinadvertising.org/wp-content/uploads/2019/10/Doterra-New-Mommy-Media-wm.png>).

¹⁴ doTerra August 1, 2018 Facebook post, <https://www.facebook.com/happierhealthierlivingwithEO/photos/a.558150357674400/1130419377114159/?type=3&theater> (also available at https://www.truthinadvertising.org/wp-content/uploads/2019/10/Doterra-facebook-8_01_18-wm.png).

¹⁵ As the former Director of the Bureau of Consumer Protection at the Federal Trade Commission explained: “[C]laims that [] products actually can prevent, treat, or cure diseases . . . place

consumers at great risk, putting their faith in unproven remedies in lieu of getting established therapies. . . . Those who succeed in selling products based on fear or unsubstantiated claims that they will treat or cure serious diseases prey on the fear and desperation of the sick, the elderly, or those without the means to afford conventional medical care.” Advertising Trends and Consumer Protection, Hearing Before Subcomm. on Cons. Prot., Product Safety and Insur., Comm. On Commerce, Science and Transp., 111th Cong. (July 22, 2009) (testimony of David Vladeck, Director, Bureau of Consumer Protection, Federal Trade Commission); *see also* Diane Hoffman and Jack Swartz, Stopping Deceptive Health Claims: The Need for a Private Right of Action Under Federal Law, 42 Am. J. Law & Med. 53, 56–57 (2016) (“Even more troubling is the potential for harm caused by giving consumers false hope that nutritional products are the best solution to their health problems. . . . Such claims might lead consumers to forgo medically recommended therapies.”).