



Altacor Inc.
7575 Fulton St. East
Ada, MI 49355 USA
616.787.1000 phone

www.alticor.com

December 19, 2016

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.
P.O. Box 927
Madison, CT 06443

RE: Smith Communication dated November 22, 2016

Dear Ms. Smith:

Thank you for providing the opportunity to address the allegations contained in your letter dated November 22, 2016. For future communications, please feel free to communicate with me directly by e-mail at [REDACTED] as there was some delay in the receipt of your letter.

Amway and its predecessors, including Nutrilite Products, Inc., have been supplying nutritional and dietary supplements under the NUTRILITE brand for at least 70 years. In a vitamin and supplement market that is remarkably diverse with many competitors, Amway's NUTRILITE brand has been a market leader for many years. The NUTRILITE brand acts as a vessel of tremendous good will for Amway, the many sellers of Amway products and the loyal customers who rely on Amway's stewardship of the brand. Over the years, Amway has invested extensively in the research, formulation and testing of NUTRILITE products, which incorporate key ingredients produced from crops grown on Amway's certified organic farms and vitamins and minerals sourced to meet Amway's quality standards.

It is with this context that I am sure you will appreciate that we do not take lightly the concerns you have raised about Internet posts purporting to contain illegal product claims. We promptly initiated an investigation upon learning of those concerns. Our findings and actions to date are summarized below.

Amway has identified the sources for 22 of the 33 posts you have identified, and those posts have been removed or are in the process of being removed. As for the remaining posts, Amway is continuing to investigate the source of those posts so that appropriate action may be taken. In some instances, Amway has been unable to determine whether the source is an Amway ABO or IBO, someone affiliated with Amway or the NUTRILITE brand, or some other individual, such as a customer or member of the public. Identification of the source of these posts has been made more difficult because some of the posts appear to be from

international sources, but we are continuing to work to identify the posters. By way of further background, the terms ABO and IBO refer to Amway's independent distributors, each of whom is required by contract to adhere to Amway's rules relating to the claims that can be made about NUTRILITE products. Those affiliated with Amway, either as an employee or by contract, also are required to follow Amway's rules regarding product claims.

Please understand that in cases where we found that the posts were inconsistent with Amway's rules or the information about NUTRILITE products that Amway publishes for ABOs and trains ABOs to use, we also are taking action to remind the posters about Amway's rules regarding product claims, and as necessary, taking additional action to obtain compliance with those rules. For those situations where Amway cannot identify the source of any posts that contain information not approved by Amway or inconsistent with Amway's rules, Amway is exploring other options for removal of the posts, including the possible use of Amway's Intellectual Property Rights to seek take down of the content under the Digital Millennium Copyright Act or a similar mechanism. In the latter case, I hope that you will appreciate that Internet hosts sometimes only take instructions from the owner of a post, and many companies have struggled with addressing how anonymous posters speak, or even misspeak, online about brands. With the rapid growth of social media this is not a just an issue for direct sellers.

As for allegations that you have made about other Direct Selling Association (DSA) members, we have nothing to add at this point beyond the perspective set forth above.

Please understand that Amway's efforts in addressing the referenced postings have been made in a sincere effort to remediate. This letter is not to be taken as an admission of wrongdoing by Amway or any Amway ABO.

Finally, I hope that you come to the understanding that Amway shares values with you when it comes to stewardship for the NUTRILITE brand and products. Thus, should you identify any other posts or concerns or you have additional information about the source of any posts, please do not hesitate to contact me.

Sincerely,



Michael A. Mohr

cc: Joseph Mariano
Jared O. Blum