
LifeVantage Opportunity Advertising

Eric Marchant [REDACTED] >

Wed, Jan 3, 2018 at 5:32 PM

To: "lsmith@truthinadvertising.org" <lsmith@truthinadvertising.org>

Cc: "acarlton@truthinadvertising.org" <acarlton@truthinadvertising.org>, Darren Jensen [REDACTED], Kevin McMurray [REDACTED]

January 3, 2018

Laura Smith, Esq.

Legal Director

Truth in Advertising, Inc.

P.O. Box 927

Madison, CT 06443

SENT VIA EMAIL ONLY

Re: LifeVantage Opportunity Advertising

Dear Ms. Smith:

Our CEO, Mr. Darren Jensen, has asked me, the Vice President of Compliance, to respond to your letter Dated December 18, 2017, referencing "Deceptive Marketing for LifeVantage Business Opportunity."

First of all, let me assure you that we do take these matters very seriously. Seriously enough to have all content on our company website reviewed by our legal and regulatory departments before it goes live. Seriously enough to have contracted with a third party service to assist us in locating, identifying, then removing inappropriate opportunity and lifestyle claims made by our independent distributors as they are posted on social media. Additionally, we have identified certain key words to help us stay on top of such claims wherever they might appear next.

However, as evidenced by your samplings, we had not included "financial freedom" in our list of key words. We agree that the use of such a term by itself or without appropriate qualifiers can be misleading. We have added this term, "residual income," and "unlimited potential income" to our key words. We have also reviewed the "lifestyle" samples you highlighted on our company website and on Instagram, i.e., jeeps, trips and other incentives featured in the opportunity and rewards pages. Again, such promotions with insufficient context could be interpreted as a misleading lifestyle claim. Accordingly, we are discussing possible changes and modifications to implement now and in the future to position such materials appropriately. By the way, the sample of "unlimited income potential" featuring Ryan Thompson, Sr. V.P. of Business Development is outdated. Ryan has not been with the company for more than two years. We are trying to remove all remnants of this video altogether.

As to our distributors, we have added relevant criteria, see keywords above, to the searches we conduct of their social media postings. We have removed and will continue to remove those found on twitter, Facebook, and elsewhere.

We appreciate your concern and dedication to these matters and look forward to improving, then perfecting our efforts towards the elimination of unsubstantiated and otherwise inappropriate income claims and lifestyle representations in the future.

Sincerely,

Eric E. Marchant

Vice President of Compliance

LifeVantage Corporation

(Direct) [REDACTED]

Cc: Darren Jensen, CEO, LifeVantage Corporation;
Kevin McMurray, General Counsel, LifeVantage Corporation
Alex Carlton, Intern, Truth in Advertising



Eric Marchant

VP of Compliance

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