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Marjorie L. Fine, Esq.
Director, Shaklee Corporation

e-Mail: [REDACTED]

March 15, 2018

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

Re: Shaklee

Dear Ms. Smith:

By way of background, Shaklee Corporation ("Shaklee") has been in business for 62 years and has become one of the most recognized names in the nutritional supplement and direct selling industries, with more than two million Distributors and Members worldwide. We have been committed to the highest standards of conduct and work hard to instill those same standards in our Distributors. One reflection of that effort is that Shaklee has held the highest possible rating from the Better Business Bureau for as long as the BBB has maintained such records (52 years).

I have reviewed each of the claims listed in your Shaklee Income Claims Database. At the outset, I'd like to note that I also reviewed all the claims listed with the DSA Code Administrator, Jared Blum, and with DSA Ethics Counsel, Joseph Aquilina. They and I agreed that none of the claims cited by TINA are violative of law or of the DSA Code of Ethics. Having had the pleasure of working with Shaklee Independent Distributors for more than 28 years, I can tell you that they are largely product-oriented and not prone to exaggerated earnings claims. The claims cited by TINA are relatively modest or puffery. However, we agree that certain claims could be improved from a consumer perspective, either by redacting statements, adding additional context, or providing average income information.

Initially, we'd like to point out that one claim TINA listed was made by a Rodan & Fields consultant named "Ky Shaklee Rapooza," which probably is why TINA incorrectly believed the individual was connected to Shaklee. Two claims listed

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were made by individuals who have not been Shaklee Distributors for a substantial time period. We believe you would agree that Shaklee has no obligation to contact such individuals. Three claims were made by Malaysia Distributors.

For the relatively few remaining Distributor claims, we have contacted each Distributor, reviewed the claims with them and discussed how the claims could be improved. In most cases, the postings were old, and the Distributors did not even recall them. Most chose to simply delete them. A few chose to add additional information, such as the Shaklee average earnings by rank chart.

Some of the claims TINA listed were from social platforms administered by Shaklee. We found no issues with the majority of these. We edited a few to improve them and made sure average earnings information is provided with each claim.

In addition to the above, we have strengthened even further the earnings claims provisions in our policies and procedures manual for the field. We plan to conduct additional training respecting earnings claims to help Shaklee Distributors construct claims that are truthful and not misleading to consumers.

We appreciate the time and effort that TINA devoted to its review of earnings claims. TINA provided an important service to the direct selling industry and to consumers.

If you have any questions about the information set forth above, please feel free to contact me at 925-924-2586.

Thank you.

Sincerely,



Marjorie L. Fine, Esq.

Cc: Joseph Mariano, President, Direct Selling Association
Jared O. Blum, Esq., DSA Code Administrator
Joseph Aquilina, DSA Ethics Counsel