



June 17, 2016

VIA REGULAR MAIL AND EMAIL

Eric Haynes, General Counsel
Nerium International
4006 Belt Line Road
Addison, TX 75001
[REDACTED]

Re: Deceptive Marketing for Nerium International Opportunity and Products

Dear Mr. Haynes:

Thank you for your response to my June 7, 2016 letter. With respect to your assertion that Nerium uses certain tools “to proactively monitor social media posts by [its] Brand Partners and the Compliance Department immediately addresses any improper product and earnings claims,” such a contention is belied by the multitude of inappropriate health and income claims that have been on the world wide web for years. Simply by Googling “Nerium” and “depression,” “Alzheimer’s,” “eczema,” or many other diseases of your choosing, the company could have found a plethora of websites and social media posts and entries making false and deceptive claims, as shown by the numerous claims we collected in the database we provided (which only represents a sampling of these types of deceptive marketing claims; it is not meant to be a comprehensive list). As for income claims, search terms such as “Nerium” and “six figures” will provide your compliance department with a starting point for income representations that do not comply with FTC law. (Again, the database of income claims we provided is only a sampling of such inappropriate claims, not a comprehensive list.)

Given your detailed representations that Nerium is using its best efforts to address the issues we have raised, however, TINA.org is willing to currently withhold bringing these issues to the attention of the Federal Trade Commission assuming Nerium fully corrects the issues described above and in my June 7, 2016 letter, and continues to take steps to ensure that there are no future misrepresentations. We will continue to closely monitor the marketing activities of Nerium and its distributors in order to determine if/when appropriate government agencies need to be alerted.

Sincerely,

A handwritten signature in blue ink that reads "L Smith". The signature is written in a cursive style with a large, looped initial "L" and a dot over the "i" in "Smith".

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