



Justin Powell
Chief Legal Officer and General Counsel

December 1, 2016

VIA U.S. MAIL AND E-MAIL (lsmith@truthinadvertising.org)

Laura Smith, Esq.
Legal Director
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Dear Ms. Smith:

Thank you for your letter to Jim Coover dated November 22, 2016, which we received and reviewed on November 29, 2016 following the Thanksgiving holiday.

The TINA.org article referenced in your letter, and the accompanying database, was brought to my attention on Sunday, November 6, 2016, as a result of our routine compliance monitoring efforts. Immediately upon becoming aware of the article and database, we examined each of the identified claims and used our best efforts to identify and contact the individuals responsible for each posting (as we routinely do when our proactive monitoring efforts identify potentially inappropriate claims). With respect to the claims you identified, I am pleased to report that we were able to contact most of the responsible persons within the first 24 hours, including many who are no longer affiliated with Isagenix and, by November 9, 2016, almost all of the identified postings were, to our knowledge, removed from the Internet. To address the remaining four that we have been unable to resolve to date (all four of whom are no longer affiliated with Isagenix), in addition to making calls to known acquaintances of the responsible individuals, we have submitted requests to Google and YouTube, as appropriate, asking for their cooperation to help us remove the applicable materials.

With hundreds of thousands of customers and independent Associates all over the world, Isagenix takes very seriously its responsibility to do what it can to ensure that its products are marketed in a truthful and lawful manner. Isagenix provides initial and ongoing training and regular reminders to all members, instructing them that they must not make medical claims under any circumstances, even if they believe them to be true.¹ Isagenix provides product disclosures and regular training to inform consumers that Isagenix products have not been evaluated by the FDA and, unless specifically stated to the contrary in official product literature as expressly

¹ These rules are included in the Isagenix Policies and Procedures which, among other things, mandate that Associates "not represent that any Isagenix product is intended to diagnose, treat, prevent, or cure any condition or disease."

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permitted under applicable law, they are not intended to diagnose, treat, cure, or prevent any disease or medical condition.

Isagenix devotes substantial resources to identify and cause the removal of Internet and social media postings that do not comply with these and other guidelines. To that end, Isagenix has a full-time staff of over 20 compliance specialists whose primary responsibility is to identify and take corrective action with respect to such postings. As further testament to Isagenix's commitment to truthful and lawful advertising, Isagenix has supplemented its compliance monitoring efforts with FieldWatch™, which, as you may know, features a state-of-the-art monitoring service to crawl the web and identify possible policy violations. Isagenix's compliance personnel then follow up on all "hits" identified by FieldWatch™ to take appropriate corrective and/or disciplinary actions. Isagenix has devoted, and will continue to devote, significant company resources to ensuring that its products are properly represented to the public.

In addition to the compliance monitoring efforts described above, Isagenix also invests heavily in proactive efforts to educate its Associates on compliant and responsible business practices. These efforts include, but are not limited to: (i) legal and compliance attendance and training at all major Isagenix events, (ii) a compliance booth at key events for the compliance team to provide guidance to Associates, (iii) legal review of proposed stage presentations, (iv) speaker meetings where compliance reminders are given prior to stage presentations, (v) legal attendance at stage rehearsals to provide compliance guidance, (vi) online tools, including videos, podcasts, and compliance guidance handouts, (vii) legal and compliance updates and guidance on Associate leadership calls, and (viii) periodic compliance training meetings with all corporate staff who interact with Associates.

We trust that our immediate response in addressing these postings as part of our routine compliance monitoring efforts, and the commitments we've made to training, monitoring, and enforcing our policies and instilling a "culture of compliance" among our Associates, will give you assurance that we share your organization's desire for truthful advertising.

Please feel free to contact me directly regarding the above or at any time in the future regarding any matter you would like to bring to our attention.

Very truly yours,



Justin Powell
Chief Legal Officer & General Counsel

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