

Laura Smith
Legal Director
Truth in Advertising
P.O. Box 927
Madison, CT 06443
Via Email and U.S. Mail

October 20, 2017

Re: Zurvita's Compliance for 2017

Dear Ms. Smith,

My name is Erin McGinnis. I am the Director of Compliance for Zurvita, Inc. and Zurvita Holdings, Inc. ("Zurvita"). I am writing to you, today, to provide you with an update on Zurvita's compliance strategies and successes so far, this year! First, please know that Zurvita takes compliance very seriously. I had the pleasure of attending the Direct Selling Compliance Seminar held in Dallas, Texas, in January, 2017, and hearing Bonnie Patten speak. Also in attendance on behalf of Zurvita were Brant Wallace, our Senior Vice President of Strategy and Resources, Angelina Whittington, our outside general counsel, and Kevin Thompson, our compliance counsel. We attended the compliance seminar as part of our ongoing efforts to learn more strategies to assist Zurvita in eradicating any advertising or messaging on the internet that does not truthfully and accurately represent Zurvita's principles, products, and programs. I have summarized below our continuous efforts, and hope that you will publish this letter to demonstrate Zurvita's genuine commitment to Truth in Advertising. You have our express permission to do so.

Specific Identified Claims: Your website included a list of "Zurvita Health Claims Database," identifying statements available on the internet that were deemed a "sampling of inappropriate health claims being made about Zurvita products." In my position as Director of Compliance, I worked with a dedicated team to create a strategy to identify each of those inappropriate health claims and, to the extent possible, to have those inappropriate health claims removed. Your office kindly assisted me with the claimants that I was unable to identify. In fact, your office kindly responded to our counsel's emails and calls numerous times throughout 2017. We appreciate your willingness to assist us. **We created a comprehensive chart** with respect to every claim identified by TINA.ORG on its Zurvita Health Claims Database demonstrating our efforts and success at removing each inappropriate health claim. The chart is being included with this letter. We hope that this comprehensive chart is made available on your website to demonstrate our ongoing commitment to police inappropriate health claims being made about Zurvita products and diligent efforts and success in removing them. Out of twenty-seven cases, twenty-three were removed, two cases were connected to inactive Consultants and one case was not located after a thorough investigation.

Self Policing: As further proof of Zurvita's ongoing investment and commitment to removing inappropriate claims, Zurvita interviewed database companies to learn more about software available to help Zurvita track improper claims that may appear on the internet from any source. In 2017, Zurvita purchased Field Watch, a software program designed to assist companies, such as Zurvita, in accessing and monitoring to social media content, allowing our compliance team to identify and work to remove improper claims.

Retail Sales: During Patten's presentation, she highlighted the need for companies to focus their energies on generating sales to non-participants (customers). I am proud to state that Zurvita currently generates more than 50% of its sales volume from customers, which exceeds the legal standards that are out there. We feel a focus on customer's leads to a more disciplined and compliant sales force.

Ongoing Commitment to Truth: Not only is Zurvita constantly monitoring the Internet for inappropriate health claims through its compliance team's daily efforts and Field Watch's patented software, but Zurvita is also monitoring any other inappropriate or exaggerated claims about any aspect of the Zurvita experience. Zurvita's founding principles are (1) to build a company that honors and glorifies God;(2) develop a company with humble leadership; (3) create an environment where people can win at every level. We at Zurvita strive to reflect these principles every day and are working hard to make sure all messaging about Zurvita on the internet is both truthful and reflective our founding principles.

Please call me to discuss any other ideas you and your team may have to assist us in our tireless efforts to reflect the truth.

With warmest regards,

Erin McGinnis

TINA.ORG "Zurvia Health Claims Database" review

| Claim | Link from TINA | Social Media Link |
|--|---|---|
| | https://www.truthinadvertising.org/wp-content/uploads/2016/07/Alzheimers-dementia_Facebook.pdf | Not Available / Deleted |
| Alzheimers, dementia Facebook | | |
| | https://www.truthinadvertising.org/wp-content/uploads/2016/07/Arthritis-Skin-Cancer_YouTube.mp4 | Not Available / Deleted - Reported to Youtube |
| Arthritis, Skin Cancer Youtube | | |
| | https://www.truthinadvertising.org/wp-content/uploads/2016/07/Back-injury_Health-and-Wellness-Through-Nutrition.pdf | Not Available / Deleted |
| Back injury, Health and Wellness Through Nutrition | | |
| | https://www.truthinadvertising.org/wp-content/uploads/2016/07/Blood-pressure_Facebook.pdf | Not Available / Deleted |
| Blood pressure Facebook | | |
| | https://www.truthinadvertising.org/wp-content/uploads/2016/07/Blood-pressure-diabetes-headache_Better-and-Well.pdf | Not Available / Deleted |
| Blood pressure, diabetes, headache Better and Well | | |
| | https://www.truthinadvertising.org/wp-content/uploads/2016/07/Cancer_Life-is-a-Miracle.pdf | Consultant Inactive |
| Cancer Life is a Miracle | | |
| | https://www.truthinadvertising.org/wp-content/uploads/2016/07/Cancer_Twitter.pdf | Not Available / Deleted |
| Cancer Twitter | | |
| | https://www.truthinadvertising.org/wp-content/uploads/2016/07/Cancer-blood-pressure_What-Is-Zeal-For-Life.pdf | Not Available / Deleted |
| Cancer, blood pressure, What Is Zeal For Life | | |
| | https://www.truthinadvertising.org/wp-content/uploads/2016/07/Cancer-diabetes_Facebook.pdf | Consultant Inactive |
| Cancer, diabetes Facebook | | |
| | https://www.truthinadvertising.org/wp-content/uploads/2016/07/Cancer-heart-disease-diabetes-plus-more_Facebook.pdf | Not Available / Deleted |
| Cancer, heart disease, diabetes, plus more Facebook | | |
| | https://www.truthinadvertising.org/wp-content/uploads/2016/07/Chrons-Disease-Thyroid-Disorders-and-More_Zeal-for-Life.pdf | Request Link |
| Chrons Disease, Thyroid Disorders and More Zeal for Life | | |
| | https://www.truthinadvertising.org/wp-content/uploads/2016/07/Diabetes_Better-and-Well.pdf | Not Available / Deleted |
| Diabetes Better and Well | | |
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| Diabetes Zeal For Life Drink | | |
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| Diabetes, blood pressure Facebook | | |
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| | https://www.truthinadvertising.org/wp-content/uploads/2016/07/Heart-disease-cancer-diabetes_Facebook.pdf | Laquita Hambrick is INACTIVE but still continuing to reach out to Facebook to remove page - Page removed |
| Heart disease, cancer, diabetes Facebook | | |
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| High blood pressure, diabetes Twitter | | |
| | https://www.truthinadvertising.org/wp-content/uploads/2016/07/Insomnia-Arthritis-and-More_YouTube.mp4 | Reported to Youtube - https://www.youtube.com/watch?v=6Zx15NOA8s |
| Insomnia, Arthritis and More Youtube | | |
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| Lupus Facebook | | |
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| Migraines, diabetes, arthritis Twitter | | |
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| Migraines, Uterine Cancer, and more Facebook | | |
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