



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

January 23, 2018

Dear Ms. Smith,

I am writing in response to your letter to Isagenix co-founder and CEO, Jim Coover, dated December 18, 2017. Thank you for sharing your concerns. Isagenix has always been committed to consumer protection and we are always receptive to information that can help us better achieve that goal. We are committed to continuous improvement and have been engaged in a comprehensive evaluation of our content.

Isagenix takes very seriously our responsibility to protect consumers, including helping them understand the realities of pursuing the business opportunity, if they so desire. We are, first and foremost, a health and wellness company in which the overwhelming majority of Isagenix members join us for the products and do not pursue the business opportunity.

Associates approach their Isagenix businesses with a variety of personal goals--from earning enough to pay for their own product purchases to making a car payment to building a business that can support much or all of their financial needs. We strive to ensure that prospective Associates understand the risks and realities of the opportunity and that no one is guaranteed to earn anything.

We invest significant time, money, and resources to help our Associates understand how to appropriately share their experiences with both the products and the business opportunity. However, we recognize that Associates can occasionally slip up despite their and our best intentions, particularly on social media where they may be accustomed to casual and enthusiastic interaction. We understand the importance of ongoing training, counseling and, at times, corrective action to help Associates comply with their legal and ethical obligations.

To that end, we devote significant resources to identifying and rectifying social media postings that do not comply with company guidelines. As we have shared with you previously, Isagenix maintains a significant full-time staff of compliance specialists whose primary responsibility is to identify and take corrective action when infractions to our policies occur. As a further testament to our commitment to truthful and lawful advertising, we have supplemented our own compliance monitoring efforts with FieldWatch™, which features a state-of-the-art monitoring service to crawl the web and identify possible policy violations. Our compliance personnel then follow up to take appropriate corrective action. Isagenix has devoted, and will continue to devote, significant company resources to promote the accurate and lawful representations of our products and business opportunity.

In addition to the compliance monitoring efforts described above, Isagenix also invests heavily in proactive efforts to educate our Associates on compliant and responsible business practices. These efforts include, but are not limited to: (i) attendance and training at major Isagenix events by legal and compliance personnel, (ii) a compliance booth at major events for the compliance team to provide guidance to Associates, (iii) legal review of proposed stage presentations, (iv) pre-event meetings where compliance reminders are provided to speakers prior to stage presentations, (v) attendance by legal personnel at 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.

The collective impact of our compliance actions has been extremely positive and the number of infractions by Associates is relatively small, especially when considering the large number of Associates who are operating Isagenix businesses. When infractions are detected, our compliance team takes needed corrective measures and provides counseling to help Associates appropriately represent Isagenix in the future.

We also respond quickly when possible policy violations are brought to our attention, as we have in this instance. Upon receiving your letter, our compliance team reviewed each Facebook post you noted and identified the responsible parties. We contacted the responsible parties and they have modified or removed the posts in question as appropriate. We are also in the process of reviewing the videos you identified to ensure each video accurately represents the Isagenix business opportunity – and we have removed, or will remove or edit those videos as needed.

We are committed to fair business practices, honest advertising, and responsible stewardship, values we share with Truth in Advertising, Inc. Accordingly, we are open to work with you regarding any concerns you may have about our business practices and to pursue any appropriate action to protect consumers. Please feel free to contact me directly if you have any questions or concerns in the future.

Sincerely,

A handwritten signature in black ink, appearing to read 'JP', written in a cursive style.

Justin Powell

Chief Legal Officer and General Counsel