



YOUNGEVITY.

Dear Ms. Smith,

Thank You for your letter of December 18th regarding Business Opportunity Marketing.

For more than the past year we have aggressively monitored Social Media as well as Independent Distributor's personally maintained websites looking for anything that looks or sounds like income claims or any other unapproved claims.

Youngevity policy strictly prohibits income claims. We not only take enforcement action promptly to arrest such claims, but we also maintain an active education program to ensure that our Staff and Distributors understand Youngevity policy on claims.

On July 19th 2016 we were contacted by Fran Silverman from Tina.org regarding various claims. Our new Company President responded and explained the steps we implemented to address and remedy any unapproved claims.

Since that time, we have brought on a full time compliance manager to address claims made by Distributors. Our entire Marketing Staff which consists of almost all newly hired, very experienced Staff members has been educated to recognize unapproved claims.

We have trained Social Media monitors who surf the web in search of possible unapproved claims which, if identified, are forwarded to our Compliance Manager and Staff for enforcement action.

We have also contracted with Momentum Factor, and trained staff on the use of "Field Watch" software.

We believe we have made great progress in educating our Distributors and Staff in this area and will remain vigilant to guard against violations of Youngevity's claims policies, including our policy against income claims.

Sincerely,
Steve Wallach
CEO
Youngevity International