

RBC LIFE SCIENCES®

BETTER NUTRITION FOR BETTER HEALTH

February 7, 2018

VIA EMAIL

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

Ms. Smith:

This letter is in response to your email of December 18, 2017 regarding allegations that RBC Life has made unsubstantiated income claims.

We have reviewed the alleged unsubstantiated income claims attributed to RBC Life on the TINA website. Following is our response to each of the examples cited:

[RBCLifeWebsite1Security](#); [RBCLifeYoutube3 \(video, description\)](#); [RBCLifeYoutube2Time \(video, description\)](#)

In reviewing each of these videos (note that the first and second link are to the same video), the only thing we could identify as the basis for your allegation was one mention of “financial freedom” in each video where one video was over 4 minutes long and the other was over 6 minutes long. While we agree that the term “financial freedom” can be used in connection with unsubstantiated income claims, we also believe that context matters. Having reviewed these videos, we believe that it is a gross overstatement to allege that the use of this term one time in videos of these lengths represents an unsubstantiated income claim that causes real and substantial harm to consumers. We do not believe any reasonable consumer viewing these videos would be misled with respect to income that may be earned from associating with RBC Life.

[RBCLifeWebsite2](#)

We have added our income disclosure chart to this page so those who read about RBC Life’s member compensation plan will also be informed of the average earnings of RBC Life members.

[RBCFacebook1](#)

This was a Facebook post by a member in Malaysia. We are working with this individual to remove this post.

[RBCFacebook2](#); [RBCLifeYoutube1Freedom \(video, description\)](#); [RBCLifeTwitter1](#)

These items have been removed by us or the responsible member, as the case may be.

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Ms. Laura Smith
January 26, 2018
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We take our responsibility to comply with laws and regulations governing the operation of our business and the DSA Code of Ethics seriously. As challenging as it is in the age of internet websites and social media, we are committed to fulfilling our responsibility to take all reasonable steps to ensure compliance by our Company and our field.

If you have any additional comments or questions, please contact us.

Sincerely,



Steven E. Brown
CEO and President

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