

February 28, 2017

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

Dear Ms. Smith,

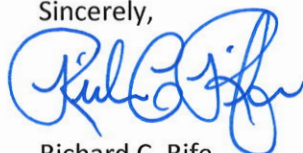
Thank you for your December 18, 2017 letter entitled "Deceptive Marketing for Morinda Business Opportunity." Morinda is committed to abiding by the DSA Code of Ethics, and to ensuring that the Morinda business opportunity is presented in a correct and fair manner. Thank you for bringing to our attention these instances of possible misrepresentations of the Morinda business opportunity.

We carefully reviewed the posts you brought to our attention. Several of those posts were included on your list because they used the term "financial freedom." We agree that the term "financial freedom" can be misleading when used in the wrong context or with inappropriate qualifiers. In some of the posts, "financial freedom" was not used in the correct context, so we have deleted or edited those posts accordingly. Also, some of the social media posts were quite old, and thus were no longer useful from a social media perspective, so we have deleted those as well. After our careful review, we determined that nine posts did not contain misleading or false claims, so we have not had those posts deleted or edited.

As others have pointed out, social media has been disruptive to many business models. At times, it is difficult to identify the author of a social media post, or the author may no longer be affiliated with the company and therefore is uncooperative in deleting a post. Additionally, as so much emphasis in social media is on new posts and on what is trending, posts that are several months or even years old are difficult to find, and therefore to edit or delete if necessary. Morinda's Web Development Department has developed web crawler program to assist with finding social media posts that are not compliant with Morinda policies and with the DSA Code of Conduct. Morinda has elected to use this internally-developed program, which has similar functionality to commercially available programs, as we can customize this program to best serve our needs.

Morinda is committed to appropriately representing its business opportunity and to training its independent distributors to do the same.

Sincerely,



Richard C. Rife
Vice President & General Counsel

cc: Joseph Mariano, President, DSA
Jared O Blum, DSA Code of Ethics Administrator



MORINDA