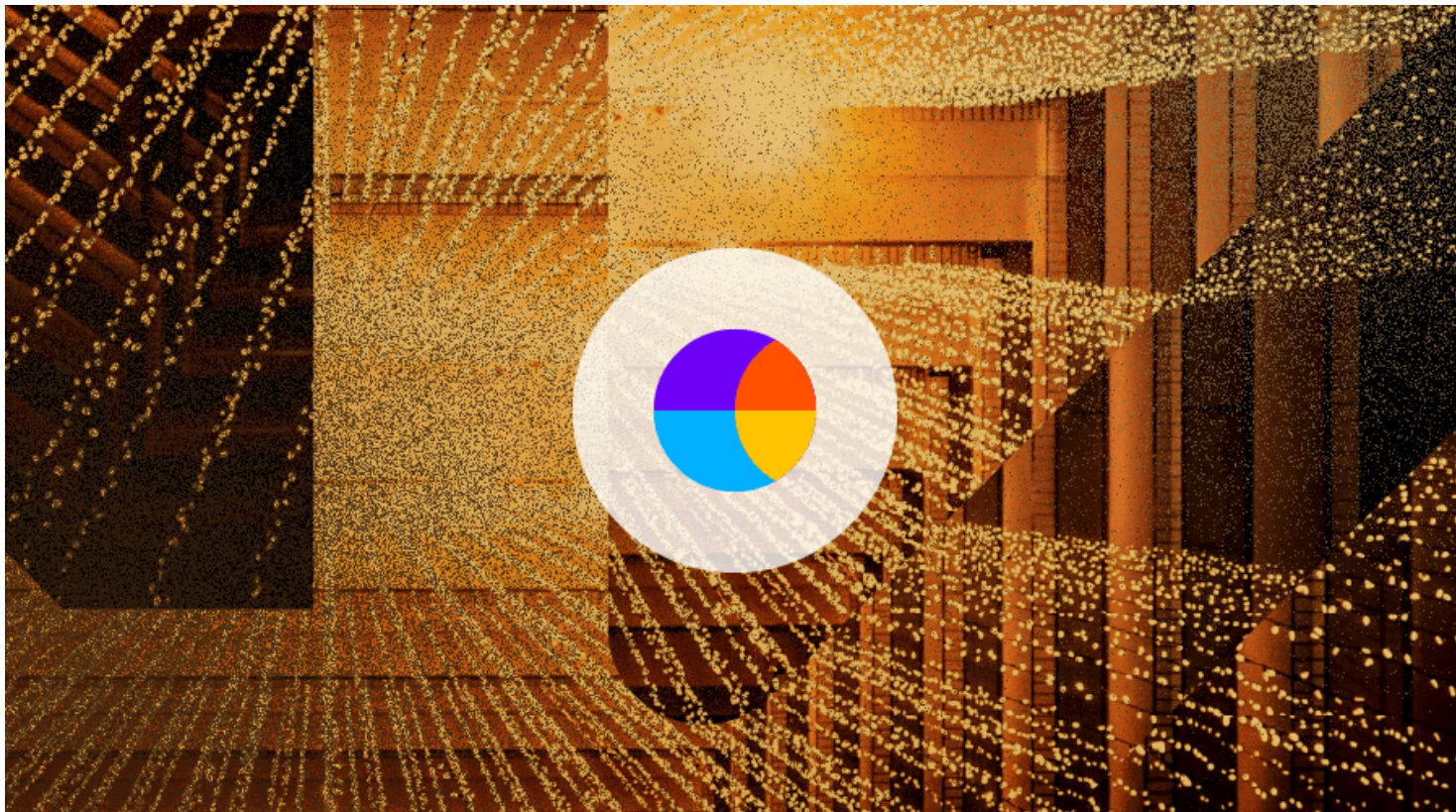


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# Case #241-2025: Monitoring Inquiry – APLGO US, LLC

## BBB NATIONAL PROGRAMS

Direct Selling Self-Regulatory Council

Case #241-2025: Monitoring Inquiry – APLGO US, LLC

### Company Description

APLGO US, LLC (“APLGO” or the “Company”) is a direct selling company founded in 2011 and based in St. Petersburg, Florida. The Company manufactures and markets health and wellness products, offering a range of items, including supplements, skin care, and hair products.

### Basis Of Inquiry

The Direct Selling Self-Regulatory Council (“DSSRC”) is a national advertising self-regulation program administered by BBB National Programs. This inquiry was commenced by DSSRC pursuant to its ongoing independent monitoring process, which monitors advertising and marketing claims disseminated by direct selling companies and their salesforce members.

This inquiry concerned 13 earnings claims disseminated by Company salesforce members on Facebook, Instagram, and on the Company website. DSSRC was concerned that the earnings claims that were the subject of this inquiry communicated the message that the typical APLGO salesforce member can earn significant income and rewards through the Company's business opportunity. The representative claims that formed the basis for DSSRC's inquiry are set forth below:

### *Earnings Claims*

1. "If you're serious about growth and financial freedom, this is an opportunity you don't want to miss." (May 2025)
2. "From financial freedom to personal growth, this business has been a game-changer for thousands of people around the world.... Whether you're just starting or looking to scale, APLGO provides unmatched support and a path to financial independence that is achievable for EVERYONE.... whether it's a side hustle or a full-time career, the opportunities are limitless. 'financial freedom... #FinancialFreedom'" (January 2025)
3. "Whether you want financial freedom, flexibility, or personal growth, APLGO is the path to a brighter future!" AND "Looking for an Elevated Career Path? A job with purpose... A career you can build anywhere." (March 2025)
4. "A compensation plan packed with unmatched bonuses to help you achieve financial freedom... become part of this life changing opportunity" # FinancialFreedom" (February 2025)
5. "One thing APLGO gives us is financial freedom. Imagine earning R370K in 3 months." (June 2024)
6. "Why choose APL for network marketing? Unlimited Income: Your earnings depend solely on your effort and persistence. Join APL and start your career in network marketing today!" (July 2024)
7. A scrolling list of minute-by-minute notifications of remuneration accompanied by text stating "Residual income is the key to getting back your time Freedom. To do the things you always wanted to do, not the things you have to do! 🏆💪 We launched this business two years ago. Today, it's a not stop daily revenue stream for our family. IPA's = Freedom. (Income Producing Assets)" #residuallife #free #freedom #livefree"
8. "Let's build an empire, you and I! ... Discover the exceptional products and business opportunities offered by APLGO, where you can build your future on your own terms. Take control of your time and financial situation by joining a movement that's empowering individuals to achieve success from the comfort of their homes ... create a lucrative business." "#FinancialFreedom"<sup>[1]</sup> (April 2025)
9. "Women on a mission to build wealth and a legacy, a mission to help others attain financial freedom, mission to heal, mission to work together and build! We are Dreaming again and we have found a vehicle to make them a reality" (April 2021)
10. "... makes the first comers incredibly wealthy based on timing and action! .... Join our APLGO family and enjoy more freedom, more financial stability, .... And by 'wealthy,' we mean achieving financial freedom...". (June 2024)
11. "APLGO is providing incredible opportunities to earn, achieve financial independence."
12. "AMBASSADORS enjoy significant privileges. Associates who achieve this qualification earn a trip to Europe for two, and admission to all APLGO events are covered by the Company."

### **Company's Position**

After receiving the DSSRC Notice of Inquiry, the Company took immediate action to address DSSRC's concerns, emphasizing its commitment to ensuring that its salesforce members operate compliantly while communicating truthful and accurate earnings claims.

The Company did not attempt to substantiate the earnings claims in the social media posts that were identified in the inquiry. Rather, the Company indicated to DSSRC that it would take the necessary action to remove the non-compliant posts.

Shortly thereafter, APLGO informed DSSRC that it had taken action to remove all social media posts containing the claims in question. Despite these efforts, two posts remained publicly visible on Facebook. APLGO explained that the posts were created by individuals who are no longer affiliated with the company's salesforce. In accordance with DSSRC's recommendations, APLGO not only attempted to contact the former salesforce members but also reached out directly to Facebook to request that the posts be taken down.

Additionally, the Company disputed DSSRC's preliminary determination that the representation on its website regarding the European trip for APLGO Ambassadors was a substantive earnings claim.

### **Analysis**

APLGO did not attempt to support the 13 claims (i.e., 12 social media posts and one online claim) with substantive data, but, instead, elected to use its best efforts to remove the posts and claims. DSSRC determined that the Company's actions were necessary and appropriate.

According to section 255.2 of the Federal Trade Commission's (FTC) Guide Concerning the Use of Endorsements and Testimonials in Advertising (the "FTC Testimonial Guides") *"An advertisement containing an endorsement relating the experience of one or more consumers on a central or key attribute of the product or service also will likely be interpreted as representing that the endorser's experience is representative of what consumers will generally achieve with the advertised product or service in actual, albeit variable, conditions of use. Therefore, an advertiser should possess and rely upon adequate substantiation for this representation. If the advertiser does not have substantiation that the endorser's experience is representative of what consumers will generally achieve, the advertisement should clearly and conspicuously disclose the generally expected performance in the depicted circumstances, and the advertiser must possess and rely on adequate substantiation for that representation."*

APLGO was successful in removing 11 of the 13 claims identified in this inquiry; During the pendency of the inquiry, APLGO reached out to the independent consultants responsible for disseminating the earnings claims on social media and asked them to change the posts or have them removed. Following the Company's efforts, only one post remained publicly accessible in its original context. APLGO informed DSSRC that the individual responsible for disseminating this post is no longer affiliated with the Company.

DSSRC recognized that several of the posts identified in this inquiry were several years old and authored by individuals who resided outside of the United States, many of whom were no longer affiliated with the Company. While acknowledging APLGO's assertion, DSSRC noted that it is essential that direct selling companies demonstrate a good-faith effort to facilitate the removal of problematic social media posts, regardless of when or where those posts originated.

When assessing social media activity originating outside the United States, DSSRC has reminded direct selling companies that posts referencing earnings potential or company incentives remain visible to audiences worldwide—including consumers in the U.S. Content that is outdated or shared by individuals no longer affiliated with the company can still shape public perceptions of the business opportunity or influence buying behavior. By taking initiative to locate and remove or revise non-compliant content, companies reaffirm their commitment to truthful marketing practices, protect consumers from potentially misleading claims, and support the integrity of industry standards.

In situations where direct selling companies are unable to reach individuals responsible for unauthorized social media posts, DSSRC advises that companies maintain detailed records of all outreach efforts to those individuals. If these attempts are unsuccessful and the posts remain publicly accessible, companies should then notify the relevant social media platform, explaining that the posts: (a) include earnings or product claims not approved by the company; (b) continue to be publicly visible despite repeated contact efforts; and (c) should therefore be removed. DSSRC has also observed that some companies have chosen to post public comments clarifying that the content was not authorized and that a formal request for its removal has been made.<sup>[2]</sup>

Accordingly, APLGO submitted documentation to DSSRC showing that the company made a genuine effort to contact the individuals responsible for the posts but did not receive a return response. In lieu of direct communication, APLGO reported the posts to Facebook and furnished DSSRC with copies of its correspondence with the platform.

DSSRC expressed ongoing concern regarding a section of the Company's webpage stating that *"AMBASSADORS enjoy significant privileges. Associates who achieve this qualification earn a trip to Europe for two, and admission to all APLGO events are covered by the Company."* DSSRC concluded that this language could reasonably lead consumers and potential salesforce members to believe that all expenses related to the trip—such as airfare and lodging—are fully paid by the Company. However, APLGO did not confirm that these incentives are provided at no cost to the salesforce member, nor does the webpage include any further details clarifying the nature or extent of the reward.

According to section 2(F) of the DSSRC Guidance of Earnings Claims in the Direct Selling Industry for purposes of a DSSRC inquiry, an earnings claim is any claim, express or implied, communicated by either the direct selling company itself or by its independent salesforce members that conveys that salesforce members may earn or have earned company-sponsored incentives, including those lifestyle purchases (such as homes, vehicles, vacations) or other rewards.<sup>[3]</sup>

DSSRC cautions that any express or implied references to free incentives will likely draw close regulatory scrutiny. Such representations can reasonably be interpreted as implying that participants in the company's business opportunity commonly achieve significant or life-changing financial success.

More specifically, pursuant to section 20 of the FTC's Business Guidance Concerning Multi-Level Marketing, *"MLMs and their participants should not suggest that a trip or car will be offered for 'free' if the person will have to pay for the item... it is reasonable for someone to view a 'free vacation' offer as providing for free all material costs of the vacation (like airfare, hotel, and a rental car). If that is not true, the MLM and its participants should either refrain from using the word 'free' or from misstating what is 'free.' (For example, if only a free hotel room is being provided, the offer should specify that: 'Free hotel room stay for X nights.')*"<sup>[4]</sup>

DSSRC has previously advised that when online content highlights atypical incentives that may be earned by a company salesforce members, it should include a clear and conspicuous disclosure placed close to the claim specifying the percentage or number of company salesforce that has actually received the reward, as well as any other material details related to the incentive.<sup>[5]</sup>

Accordingly, DSSRC recommended that the website claim regarding the incentive trip for Company Ambassadors be modified or removed to include more details about the nature of the incentive trip as described above.

## Conclusion

APLGO made a good-faith effort to remove the earnings claims disseminated in the identified social media posts. DSSRC confirmed that the Company removed 11 of the 12 social media posts that were at issue in the inquiry. APLGO provided DSSRC with its correspondence to Facebook notifying the platform of the unauthorized post and requesting that it be disabled. Additionally, DSSRC advised APLGO to post a comment in the applicable section of the post informing the public that the earnings claim was not authorized by the Company.

DSSRC also concluded that in the context that the statement is presented, reference to Company Ambassadors earning a trip to Europe could be reasonably interpreted by consumers and prospective salesforce members as meaning that the incentive trip is free in its entirety and, if this is not the case, DSSRC recommended that the claim be removed or, alternatively, qualified by including a clear and conspicuous disclosure in close proximity to the triggering incentive claim indicating the number of salesforce members who have earned incentive trips in the past.

### Company Statement

“APLGO is profoundly grateful to the Direct Selling Self-Regulatory Council (“DSSRC”) and the outstanding DSSRC representatives with whom it has worked. Working with the DSSRC has been a tremendously beneficial process for us. We greatly respect the insights, position and guidance of the DSSRC regarding the matters involved in this inquiry and consider its input to be absolutely invaluable. We have the greatest respect and admiration for the DSSRC and the work it does.

As it has always done, APLGO will continue to carefully scrutinize all of its marketing resources and those of its associates that include income and opportunity claims to insure compliance with state and federal laws. In closing, APLGO wants to again express its gratitude and appreciation for the great work the DSSRC is doing for individual direct selling companies, as well as the entire direct selling industry.”

(Case #241, closed on 10/6/25)

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<sup>[1]</sup> DSSRC identified this claim on two separate Facebook posts.

<sup>[2]</sup> It is also requested of direct selling companies that such correspondence be provided to DSSRC as a demonstration of its good faith efforts.

<sup>[3]</sup> See the Direct Selling Self-Regulatory Council Guidance of Earnings Claims in the Direct Selling Industry at [dssrc\\_guidanceonearningsclaimsforthedirectsellingindustry.pdf](https://dssrc.org/guidance/earnings-claims-for-the-direct-selling-industry.pdf).

<sup>[4]</sup> See the FTC’s Business Guidance Concerning Multi-Level Marketing, section 20 at <https://www.ftc.gov/business-guidance/resources/business-guidance-concerning-multi-level-marketing>

<sup>[5]</sup> See *SeneGence International*, DSSRC Case #207-2025 and *MONAT Global Corp*, DSSRC Case #171-2024.

December 15, 2025

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