

- [Vendor Privacy Program](#)
- [Volkswagen Car-Net & Audi Connect](#)

## Our 501c3 Foundation



[Learn About CISR](#)

[What Is BBB National Programs?](#)

1. [Home](#)
2. [Programs](#)
3. [Advertising Self-Regulation](#)
4. [Direct Selling Self-Regulatory Council \(DSSRC\)](#)
5. [Case Decisions](#)
6. [Case #197-2025: Changing The Future Outcomes, Inc.](#)

# Case #197-2025: Monitoring Inquiry - Changing The Future Outcomes, Inc.

## BBB NATIONAL PROGRAMS

Direct Selling Self-Regulatory Council

Case #197-2025: Monitoring Inquiry - Changing The Future Outcomes, Inc.

### Company Description

Changing the Future Outcomes, Inc (“CTFO” or the “Company”) is a health and wellness company specializing in CBD-based products. Founded in 2015 and headquartered in Reno, Nevada, CTFO offers a diverse range of products, including CBD oils, tinctures, topical creams, capsules, and pet products, all derived from hemp and designed to promote overall health.

### 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 of advertising and marketing claims in the direct selling industry.

DSSRC was concerned that the earnings claims listed below overstated the amount of income that can be earned by the typical CTFO salesforce member and that the representative product performance claims communicated the message that CTFO products are efficacious to treat several health-related conditions.

The online claims were disseminated on Facebook, TikTok, YouTube, Vimeo, Instagram, and on the Company website.

### *Earnings Claims*

1. "Up To \$2,500 Weekly Leadership Impact Bonus Possible" and "You could earn over \$13,000, but that's not the exciting part."
2. "Get paid weekly 🏆, have products that everyone wants and needs with NO RISK. . . An amazing compensation plan like no other for those wanting to make some extra \$ \$ \$ or make life changing income!!" (October 2018)
3. "Get in touch to learn how to make a 5-figure income from these products." (June 2020)
4. "There's no caps to your income" and "This is really the perfect timing to get started in your business today and create that lifestyle income." (February 2023)
5. "You can start part-time and keep doing what you're doing for income now, and when this gets bigger than other income, then you decide what you want to do." and "I highly recommend you start creating your lifestyle income today." "We've got one of the highest payouts in the industry and it creates true walkaway residual income. That's what you want to be earning for your family." and "You'll get another \$300 on top of that 200, so that's a total of \$500 you can earn in your first 45 days." (August 2022)
6. "TWO ACTION STEPS TO THRIVE & 5 TIMES YOUR INCOME" and "making a few hundred dollars a week to a 2000 becomes our 5k we want to create a 5k factory" and "we want people that want to maybe leave their job one day or looking for full-time income or looking for real serious life-changing financial freedom" (August 2022)
7. What would an extra \$500 - \$1000 per month do for your family? #payoffdebt #fixyourcredit #newhomeowner #payforcollege #carloans #mortgage #tiredofbeingbroke" (February 2022)
8. "change your life forever both health-wise and financially"; "we could earn over four thousand dollars a month"; "\$34.99 for a whole month supply you'd be making over \$5,000"; "making over \$7,000 a month" and "eighteen thousand dollars a month" (January 2020)
9. Changing the Future Outcome advertisement on dollar bill and "The CBDa Gold Rush" (on background of gold nuggets)
10. "❤️ I LOVE HOW THIS COMPANY HAS HELPED ME GAIN FINANCIAL FREEDOM" "Want money to pay off debt, save to buy a house, go on vacation or save to retire early?" (June 2020)
11. "... hers in their health & wellness journey. . . Plus Free cruise promos!" (July 2022)

### *Product Performance Claims:*

1. "This exclusive formula is designed to be a catalyst for noticeable weight loss. Expertly formulated to support elevated mood & energy, reduce appetite, decrease carbohydrate cravings, and increase metabolic efficiency to release stubborn stored fat and burn it for energy. Formulated by a Naturopathic Doctor, select clinically researched weight loss enhancers have been combined to help speed up the journey to your ideal weight." (July 2023)
2. "Reduce Oxidative Stress: Stress, Poor Diet, Smoking, and Infections."
3. "First it helps with stress, fatigue, difficulty concentrating, poor memory, trouble sleeping, low libido, frequent illness so it builds your immune system, anxiety, low endurance, mentally or physically, joint pain, and neurological conditions." (August 2019)
4. "We are 365 nights seizure free 100% because of 10x Pure Super 1000 CBD oil with CBDa 🙏🙏 He has ONLY been on this & 0 meds & has stayed seizure free. There is NO other explanation & his neurologist told me 'Whatever you are doing, keep doing it'" (February 2022)
5. "Yesterday, my arthritis/cramp started coming into my right hand. All I did was spray some mist on it and literally within less than a minute there was no more pain and no more stiffness in my hand." (March 2023)
6. "Offset Anxiety and Depression
  1. Relieve Unmanageable Pain
  2. Treat Select Epilepsy Syndromes
  3. Reduce PTSD Symptoms
  4. Treat Opioid Addiction
  5. Alleviate ALS Symptoms
  6. Relieves Insomnia
  7. Ease Diabetic Complications
  8. Protect Against Neurological Disease
  9. Inhibit Arthritis Symptoms" (September 2022)
7. "Do you suffer from any of these conditions? ADD/ADHD, Addiction, Aids, ALS, Alzheimer, Anorexia, Anit-Depressant, Antibiotic Resistance, Anxiety, Asthma, Arthritis, Cancer, Chronic Pain, Cramps, Depression, Diabetes, Epilepsy & Seizures, Fibromyalgia, Inflammation, Join Pain, Migraines/Headache, Motion Sickness, Muscle Spasms, Muscle Soreness, Nausea, Obesity, OCD, Pain, PMS/Menopause, PTSD, Skin Conditions, Psoriasis, Sleep Disorders, Spinal Cord Injury, Stress, Tension Relief, Wrinkles, and more..." (September 2022)
8. "As many of you know, I have been in chronic pain from fibromyalgia, arthritis, degenerative disc disease, type 2 diabetes and many more conditions. . . I started using it in the end of July and it has changed my life! I can move without pain, I actually got off of a Narcotic prescription a couple of months ago because of that amazing oil." (October 2020)

## 9. “-REDUCES ANXIETY

- RELIEVES JOINT PAIN
  - LOWERS STRESS
  - HELPS WITH DIGESTIVE ISSUES
  - IMPROVES ENERGY LEVELS
  - HELPS WITH CARDIAC ISSUES”
- (April 2022)

10. “LOOK GOOD, LIVE HEALTHY, LOSE WEIGHT, STAY PAIN AND ANXIETY FREE, MOST DEFINITELY MAKE SOME MONEY AND HELP OTHERS DO THE SAME!” (March 2021)

11. Picture insinuating that CBD product will help cure anxiety and depression. (June 2020)

### Company’s Position

CTFO contacted DSSRC shortly after its receipt of the Notice of Inquiry. The Company took steps to facilitate the removal of the claims at issue rather than attempting to provide substantiation for the representations.

According to CTFO, salesforce members are trained to discuss the quality and purity of its products, which are free from THC and meet industry standards. The Company has expanded its product line to include items focusing on performance and wellness.

CTFO stated to DSSRC that it emphasizes regulatory compliance through several key practices. More specifically, the Company informed DSSRC that it mandates that its Associates comply with all federal, state, and local laws and regulations in conducting their business activities. This includes adherence to ordinances related to home-based businesses and other relevant legal requirements.

CTFO explained that it has established comprehensive Policies and Procedures that define the relationship between the Company and its Associates. These guidelines set standards for acceptable business conduct and ensure that Associates operate within the legal framework.

In addition, CTFO stated that it ensures that its products undergo rigorous testing to meet regulatory standards and that its products are tested for potency and quality, with results indicating compliance with prescribed acceptance criteria.

Upon receipt of the DSSRC Notice of Inquiry, CTFO began reaching out to the individuals responsible for the posts to request that they be removed. The Company noted that a number of the posts identified by DSSRC were several years old and some of the individuals responsible for the posts were no longer active salesforce members but, notwithstanding, it used its best efforts to contact them.

The Company was successful in removing all 11 of the earnings posts that were brought to its attention and three of the 11 product performance claims.

### Analysis

DSSRC acknowledged CTFO's good faith efforts to address its concerns and determined that the actions taken to remove the claims in question were both necessary and appropriate.

#### *Earnings Claims*

The Federal Trade Commission’s (FTC) Business Guidance on Multi-Level Marketing emphasizes that all statements made by MLM companies or their participants about the business opportunity, including earnings potential, must comply with Section 5 of the FTC Act. This means claims that are material to consumers and are false, misleading, or unsupported violate the law. Earnings representations must honestly depict what an average member of the salesforce is likely to earn. MLMs and participants are required to substantiate these claims with reliable, objective evidence at the time they are made, rather than relying on personal stories or opinions. Presenting claims without adequate proof is considered deceptive and unlawful under the FTC Act.<sup>1</sup>

In past self-regulatory inquiries, DSSRC has consistently emphasized that it is deceptive for a direct selling company or its salesforce members to make earnings claims without having a reasonable basis and proper documentation to substantiate the claims at the time they are made.<sup>2</sup>

The Direct Selling Self-Regulatory Council Guidance on Earnings Claims in the Direct Selling Industry (the "DSSRC Earnings Claims Guidance") specifies that any earnings claims must be supported by evidence demonstrating their accuracy for the individuals depicted. If the earnings are not typical, a clear and conspicuous (i.e., noticeable) disclosure should be provided near the claim, indicating the income that a typical salesforce member can generally expect in the given scenario. Furthermore, these claims must always be truthful and not misleading.

The DSSRC Earnings Claims Guidance cautions direct selling companies that certain words and phrases are prohibited when addressing a general audience of prospective or current salesforce members. Such words and phrases include statements such as “quit your job,” “be set for life,” “make more money than you ever have imagined or thought possible,” “unlimited income,” “full-time income,” “replacement

income,” “career-level income,” or any substantially similar statements or representations. In addition, certain words or phrases can be particularly misleading to consumers when used in a general context such as “financial freedom.”

DSSRC was appreciative of the Company’s efforts to facilitate the removal of all of the earnings claims that were brought to its attention.

### *Product Performance Claims*

CTFO recognized that the product performance claims at issue in the inquiry were not appropriate, however, it was only successful in removing three of the 11 product performance claims.

With respect to the eight remaining posts, which remain publicly accessible, CTFO provided DSSRC with detailed information regarding the steps that it has taken to have the posts removed.

More specifically, regarding the remaining posts, the Company confirmed to DSSRC that:

- CTFO sent written correspondence to the individuals responsible for product performance posts #5, #6, and #10 in the Basis of Inquiry but the salesforce members were unresponsive and their accounts were suspended. In addition, the posts were reported to Facebook and CTFO requested that the posts be removed;
- The individuals responsible for product performance posts #4, #8, and #11 in the Basis of Inquiry no longer have access to the social media accounts where the posts were disseminated. CTFO reported the posts to the respective platforms (i.e., Facebook and Instagram) and requested that the posts be removed; and
- The accounts of the individuals responsible for product performance posts #1 and #9 in the Basis of Inquiry had been previously terminated by CTFO and the Company reported the posts to the respective platforms (i.e., TikTok and Facebook) and requested that the posts be removed.

DSSRC agreed that the actions taken by CTFO to reconcile the posts were imperative.

Marketers are required to ensure that product claims are both truthful and accurate and supported by adequate evidence, as specified in the FTC’s Health Products Compliance Guidance. Advertisers must have a reasonable basis for their claims before making them publicly available. What qualifies as a reasonable basis depends on the nature of the claim, how it is framed within the context of the advertisement, and any disclaimers or qualifications provided. As highlighted in previous DSSRC inquiries, the FTC enforces a particularly stringent standard for substantiating health-related claims.<sup>3</sup>

Moreover, the FTC requires health-related product claims about efficacy or safety to be supported by “competent and reliable scientific evidence.” This evidence must satisfy two primary criteria: (1) it must be conducted and assessed objectively by qualified experts in the relevant field of the disease, condition, or function addressed by the claim, and (2) it must be widely accepted within the professional community as yielding accurate and dependable results. Additionally, the FTC insists that the research meets high standards of quality and quantity, consistent with those generally accepted in the applicable scientific fields and be considered in the context of the entire body of reliable scientific evidence to substantiate the claim’s validity.

Regarding the eight posts that are still publicly accessible, DSSRC has noted in previous matters that if improper claims were made by an individual who was an active salesforce member at the time but has since become inactive, the direct selling company may not be able to compel the individual to remove the social media post. In such cases, DSSRC recommends that the company provide it with copies of the correspondence sent to those individuals to demonstrate that it has made a genuine good faith effort to have the improper claims removed.<sup>4</sup>

DSSRC recognized that the CTFO provided written confirmation of its outreach to the individuals responsible for the remaining social media posts and its correspondence to the social media platforms requesting that the posts be removed because of the objectionable product performance claims. Notwithstanding these good faith efforts, DSSRC further recommends that the Company attempt to post a statement in the comment section of those eight posts informing the public that the subject claims have not been authorized by CTFO and that they have requested their removal.<sup>5</sup>

### **Conclusion**

DSSRC acknowledged the actions taken by CTFO to remove all of the earnings claims and three of the 11 product performance claims at issue in the inquiry. DSSRC also confirmed that the Company attempted to contact both the individuals responsible for the eight remaining posts and the social media platforms where the posts appeared to request that they be removed.

Notwithstanding these good faith efforts, DSSRC further recommends that the Company attempt to post a statement in the comment section of those eight posts informing the public that the subject claims have not been authorized by CTFO and that they have requested their removal.

### **Company Statement**

“CTFO will be happy to adhere to the DSSRC’s recommendation that it post statements in the comment section of each remaining posts that the claims made therein are not authorized by CTFO and that it requests their removal. CTFO is extremely grateful for the work of the

DSSRC and the opportunity that we have had to interact with it. We want to profoundly thank the Direct Selling Self-Regulatory Council for its invaluable assistance in helping our company and our Associates to comply with U.S. regulatory requirements.

It is unfortunate that U.S. federal and state regulatory agencies do not see themselves as do the majority of their counterparts in developed nations, and that is as providers of guidance to businesses with respect to regulatory compliance. For this reason, we view the DSSRC as an invaluable important partner to CTFO and to the entire direct selling industry. CTFO wants to also recognize the work of the DSSRC to protect consumers and the marketplace, as well as helping to contribute to a level playing field for all direct selling companies.

(Case No. 197, Closed on 12/20/24)

©2025. BBB National Programs

[1] Section 13 at <https://www.ftc.gov/business-guidance/resources/business-guidance-concerning-multi-level-marketing#deceptive>.

[2] See DSSRC Cases #123-2023 (Pure Haven, Inc.) and #103-2023 (Essential Bodywear).

[3] See DSSRC cases #130-2023 (Healy World) and #123-2023 (Pure Haven, Inc.).

[4] See DSSRC cases #148-2024 (LiveGood, Inc. USA) and #83-2022 (Root Wellness, LLC).

[5] DSSRC acknowledges that certain social media platforms do not permit public comments.

3.03.25

**Subscribe to Stay Up-to-Date**