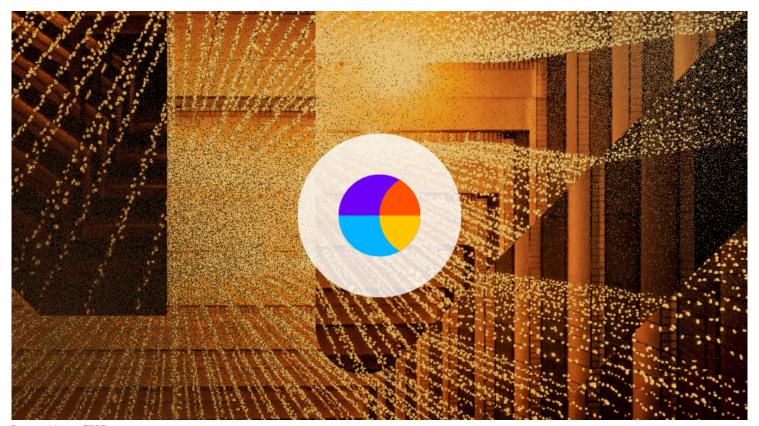
- <u>Vendor Privacy Program</u>
- Volkswagen Car-Net & Audi Connect

#### Our 501c3 Foundation



<u>Learn About CISR</u>
<u>What Is BBB National Programs?</u>

- 1. Home
- 2. Programs
- 3. Advertising Self-Regulation
- 4. Direct Selling Self-Regulatory Council (DSSRC)
- 5. Case Decisions
- 6. Case #208-2025: FARMASI

# Case #208-2025: Monitoring Inquiry – FARMASI

#### **BBB NATIONAL PROGRAMS**

Direct Selling Self-Regulatory Council Case #208-2025: Monitoring Inquiry – FARMASI

#### **Company Description**

FARMASI (or the "Company") is a multi-level marketing company with its U.S. headquarters in Doral, Florida. The Company launched in the U.S. in 2019 and markets cosmetic, skincare, haircare, and personal care 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 of advertising in the direct selling marketplace and pertains to income claims disseminated by the Company and its salesforce members. DSSRC was concerned that the representative

claims below communicated the message that the typical FARMASI salesforce member can generally expect to earn significant income from the Company's business opportunity.

The representative claims that formed the basis of this inquiry are set forth below:

#### Earnings Claims

- 1. "Whether your goal is to supplement your income or make FARMASI your full time career, we're committed to helping you earn as quickly as possible."
- 2. "My husband was supportive but gave me a goal, I HAD to profit \$1k my first month. Well, I TRIPLED that goal! With FARMASI, we went from a negative \$800 or more bank account every month to making almost \$30k a month!!!"
- 3. "I managed to be one of the first 100 FOUNDERS of the company. In only 5 months I won a trip to Istanbul, Turkey to visit FARMASI CITY and Antalya to the great annual convention. Everything was paid for it was truly incredible! FARMASI has changed my life and that of my team. Today I have TOTAL financial peace of mind, I live 100% off my FARMASI business."
- 4. "When I met FARMASI I had 5 part-time jobs, my mother was battling against cancer, I had many debts. My son, I did not see him grow up because I never had the time! Today I am free of jobs, my parents have a pension, and I am fulfilling my son's dreams."
- 5. "I thank God for FARMASI! I always asked for flexibility of time, to be able to work from anywhere, and to earn a decent living while doing something that I could love. I never imagined that FARMASI would be the answer and even more ... and even more through the opportunity to generate income in freedom is something that I could never imagine. And it is not only the money that I never thought I would see, or the trips that I never thought I would earn but the personal growth, the teamwork, the closeness with the corporation and the beautiful sisterhood. If it were only money it would not be enough but FARMASI is much more. At FARMASI I not only have a job but more than I could ask for or dream of."
- 6. "Debt & financial freedom A FARMASI has allowed me to save, pay off school debt, and have more financial freedom than I ever have."
- 7. "Our lives have changed so much since I said "yes" to FARMASI., but outside of the financial freedom its given me so much more."
- 8. "Without FARMASI I was struggling so hard to make ends meet. I know can keep my fridge full and have outings with my kids. I even bought my daughter a laptop for school. Do you need this financial freedom?"
- 9. Image of large check for the amount of \$1,000
- 10. "Let's take a look back at the last 4 years of FARMASI...
  - \$82 MILLION dollars in personal team sales
  - Over 60k men & women from around the world on my team
  - Multiple 6 figures earned
  - \$350 car bonus every month for 3.5 years
  - Multiple trips around the world (Turkey, Mexico x2 & Spain)
  - The ability to buy my first house at 21 & 23
  - Spoke on stage 4 times
  - Top #100 leader for 4 years straight
  - Top recruiter, seller, & income earner"
- 11. "It is covering every single bill we have.

It is starting to put money towards retirement! Because I have zero lol

It is starting to put money towards my kids' college funds!

It is going to help us have a blast in Disney with no stress in 3 weeks!

Never ever ever did I think I would be able to make this kind of income!"

- 12. "Uncapped earning potential"
- 13. "Empowering women to achieve financial independence is at the core of what we do at FARMASI. Let all Our business opportunity opens doors for women to take control of their financial future, build their own successful businesses, and thrive on their own terms.
  - Whether you're a stay-at-home mom, a student, or a career woman looking for a change, FARMASI provides the tools, support, and resources you need to succeed. Join us on this journey to financial freedom and empowerment! \* # #FinancialIndependence"
- 14. " \$1,000-\$500,000 in bonuses
  - ar bonus for any car you want"
- 15. "Or you are new and needing guidance to build a business and make an income...

In the last 4 years my team and I have built a community of over 2100 women  $\theta$ 

With over 18,000 online (repeat and loyal) customers

With over \$15,000,000 in team sales \*\* "

- 16. "Not only has my FARMASI pay for July exceeded my regular income but I made it into the top 20 sellers!

  Dya know I just love this business, it's helped loads with my mental health, it's got me debt free and it's now paying for another holiday! \*\*

  ""
- 17. "My pay just hit my bank & I'm sat here in total awe! 8 months being with FARMASI and a 4-figure income I've only ever dreamt of ©"
- 18. "It was FARMASI pay day yesterday (they paid us days early) and my jaw hit the floor when I saw that number... I've never came even remotely close to that number before!! I surpassed my monthly income of my 10 year teaching degree with a masters! In only 4 months!!"

- 19. Image of large checks with copy stating "Finally got my giant \*bonus\* checks hung up! Still can't believe everything FARMASI has done for me this past year. Aside from an income, the trips, training and community have been absolutely incredible. And we're still just getting started!"
- 20. "I have watched women in my company Be able to pull themselves and their families out of poverty and live lives of financial freedom! I've personally earned TWO \$1000 cash bonuses on top of my regular income and multiple trips that have taken me around the world to places I'd never have seen otherwise! It's Hard to be distracted when I'm not far behind those women who live those lifestyles of financial freedom."

#### **Company's Position**

FARMASI did not attempt to support the earnings claims that were brought to its attention. Rather, the Company took action to contact the individuals responsible for the claims at issue and request that they be removed.<sup>1</sup>

As a result of the Company's actions, 12 of the 20 earnings claims brought to FARMASI's attention were removed.

FARMASI provided DSSRC with copies of the correspondence that was sent to the salesforce members who were responsible for disseminating the eight posts that remain publicly accessible.

### **Analysis**

DSSRC verified that the Company voluntarily removed 12 of the 20 claims identified in the inquiry, including five claims that were disseminated on the Company website, and determined that FARMASI's actions were necessary and appropriate.

Notwithstanding the Company's actions, DSSRC remained concerned with the eight existing, unqualified claims communicating that the typical FARMASI salesforce member can earn significant income from the Company's business opportunity. For example, social media posts that remain publicly accessible and targeted to potential entry-level salesforce members claim that the FARMASI business opportunity will allow them to, among other things, earn more than they ever had before, have "uncapped earning potential," earn a "6-figure" income," and achieve "financial freedom."

DSSRC determined that these earnings claims communicate an unrealistic picture of the income that the typical Company salesforce member can generally expect to receive from participating in the FARMASI business opportunity. The Company did not provide DSSRC with any evidence to support such assertions.

The Federal Trade Commission's (FTC) Business Guidance for Multi-Level Marketing ("the FTC Guidance") states that "any earnings claim should reflect what the typical person to whom the representation is directed is likely to achieve in income, profit, or appreciation." Moreover, an MLM or individual participant making claims about MLM income must have a reasonable basis for the claims disseminated to current or prospective participants about the business opportunity at the time it makes the claims. This includes "reliable, empirical evidence demonstrating that the typical person in the group . . . is likely to realize . . . an amount equal to or greater than that conveyed by the earnings or lifestyle claim." The FTC Guidance further notes that given the reality of MLM experiences, even truthful testimonials of individuals who earn large amounts of money or career-level money is atypical to the what most MLM participants will achieve. Therefore, presenting atypical earnings "is likely to generate a deceptive impression" of the earning potential of a given business opportunity.

Similarly, it is a core principle of the DSSRC Guidance on Earnings Claims for the Direct Selling Industry ("the DSSRC Earnings Claim Guidance") that it is misleading for a direct selling company and/or its salesforce members to make any earnings claim unless the direct selling company and/or its salesforce members: (a) have a reasonable basis for the claim at the time the claim is made; and (b) have documentation that substantiates the claim at the time the claim is made. Moreover, claims such as "full-time income" and "replacement income" should be avoided when communicated to prospective or current salesforce members. It is further noted that "[s]ome words or phrases carry a particularly high risk of being misleading to consumers when communicated in a general context. Such words and phrases include but are not limited to "financial freedom...".

In the absence of any evidence demonstrating that the earnings claims communicated in the social media posts that remain accessible to the public reflect the amount of income that can be generally expected by the typical FARMASI salesforce member, DSSRC recommended that the Company continue its efforts to facilitate the discontinuance or modification of the subject earnings claims.

DSSRC appreciated FARMASI providing copies of the correspondence to the Company salesforce members that were responsible for posting the claims at issue and determined that the documentation demonstrated that the Company had made a good faith effort to address DSSRC's concerns. Notwithstanding, if the individuals responsible for the remaining eight social media posts are active salesforce members with the Company and continue to be unresponsive to FARMASI's requests to reconcile the posts, DSSRC recommended that

FARMASI should pursue the appropriate enforcement mechanisms (i.e., termination or suspension of the individual's account) that are available to the Company pursuant to its contract with the salesforce members.<sup>9</sup>

Lastly, if the Company remains unsuccessful in having the individuals remove the eight publicly accessible posts, as a demonstration of its good faith efforts to address DSSRC's concerns, FARMASI should attempt to contact the platform where the posts were disseminated to advise them of the unauthorized claims and request that the posts be removed. Additionally, if the platform permits, DSSRC also recommended that FARMASI add a statement in the comment section of the posts to inform the public that the claim in question has not been authorized by the Company.

#### Conclusion

DSSRC confirmed that 12 of the 20 earnings claims brought to the Company's attention have been removed. Notwithstanding this action, DSSRC remained concerned with the eight remaining unqualified claims that it determined communicates that the typical FARMASI salesforce member can earn significant income from the Company's business opportunity.

DSSRC determined that in the absence of any evidence indicating that such income could be generally expected by the typical FARMASI salesforce member, such posts should be discontinued or modified to remove the identified earnings claims. While acknowledging the Company's good faith efforts to contact the salesforce members responsible for the post, DSSRC further recommended that if the Company remains unsuccessful in having the individuals remove the posts, it should pursue any appropriate enforcement mechanisms against the salesforce members responsible for the claim and subsequently contact the social media platform where the claims appear to advise them of the unauthorized claims and request that the posts be removed. Lastly, if the platform permits, DSSRC recommended that FARMASI add a statement in the comment section of the posts to inform the public that the claim in question has not been authorized by the Company.

#### **Failure to Provide Company Statement**

Despite multiple requests from DSSRC for a Company Statement confirming that Farmasi would take appropriate action against active salesforce members responsible for the remaining accessible posts and contact the social media platform to report the unauthorized claims and request their removal, Farmasi did not respond to DSSRC's requests. Given that the Company removed most of the claims that were brought to its attention in this inquiry and provided DSSRC with copies of its attempted communication with the salesforce members responsible for the social media posts that remain accessible, DSSRC concluded that this matter did not warrant a referral to the government at this time. Notwithstanding, DSSRC will continue to closely monitor the earnings claims disseminated by the Company and its salesforce members and initiate a compliance inquiry should it identify an ongoing pattern of unsupported earnings claims.

(Case No 208-2025. Closed on 04/02/25) © 2025 BBB National Programs

- [1] The eight social media posts that remain publicly available listed as #10, #11, #12, #13, #15, #17, #18 and #20 in the DSSRC Basis of Inquiry.
- [2] See Fed. Trade Comm'n, Business Guidance Concerning Multi-Level Marketing, Section 13 (April 2024) https://www.ftc.gov/business-guidance/resources/business-guidance-concerning-multi-level-marketing#deceptive.
- [3] *Id.* at Section 18.
- [4] *Id*.
- [5] Id. at Section 13.
- [6] Direct Selling Self-Regulatory Council, Guidance on Earnings Claims for the Direct Selling Industry, Section 1 (2022). dssrc\_guidanceonearningsclaimsforthedirectsellingindustry.pdf.
- [7] *Id*, at Section 6.
- [8] *Id.* at Section 6(A).
- [9] As previously stated by DSSRC in past inquiries—and as outlined in Section (V)(D)(3) of the DSSRC Policies & Procedures—DSSRC may request documentation from a Company as evidence of its good faith efforts and due diligence. Specifically, DSSRC asks the

Company to provide copies of the communications it sent to its salesforce member(s) and/or the relevant social media platforms instructing them to address and reconcile the posts identified in the inquiry. In this inquiry, although FARMASI did provide copies of the correspondence sent to the salesforce members responsible for the remaining claims, there was no evidence provided that the Company attempted to contact the social media platforms where the social media posts appear.

May 07, 2025

# Subscribe to Stay Up-to-Date



BBB National Programs, navigate home

- Careers
  - Online Archive
  - Center for Industry Self-Regulation
  - Frequently Asked Questions (FAQs)
- Our Programs
  - o Advertising
  - Children's
  - Privacy Accountability
  - <u>Dispute Resolution</u>
  - Emerging
- Media & Resources
  - Events
  - o <u>Blog</u>
  - <u>Decisions</u>
  - Press Releases