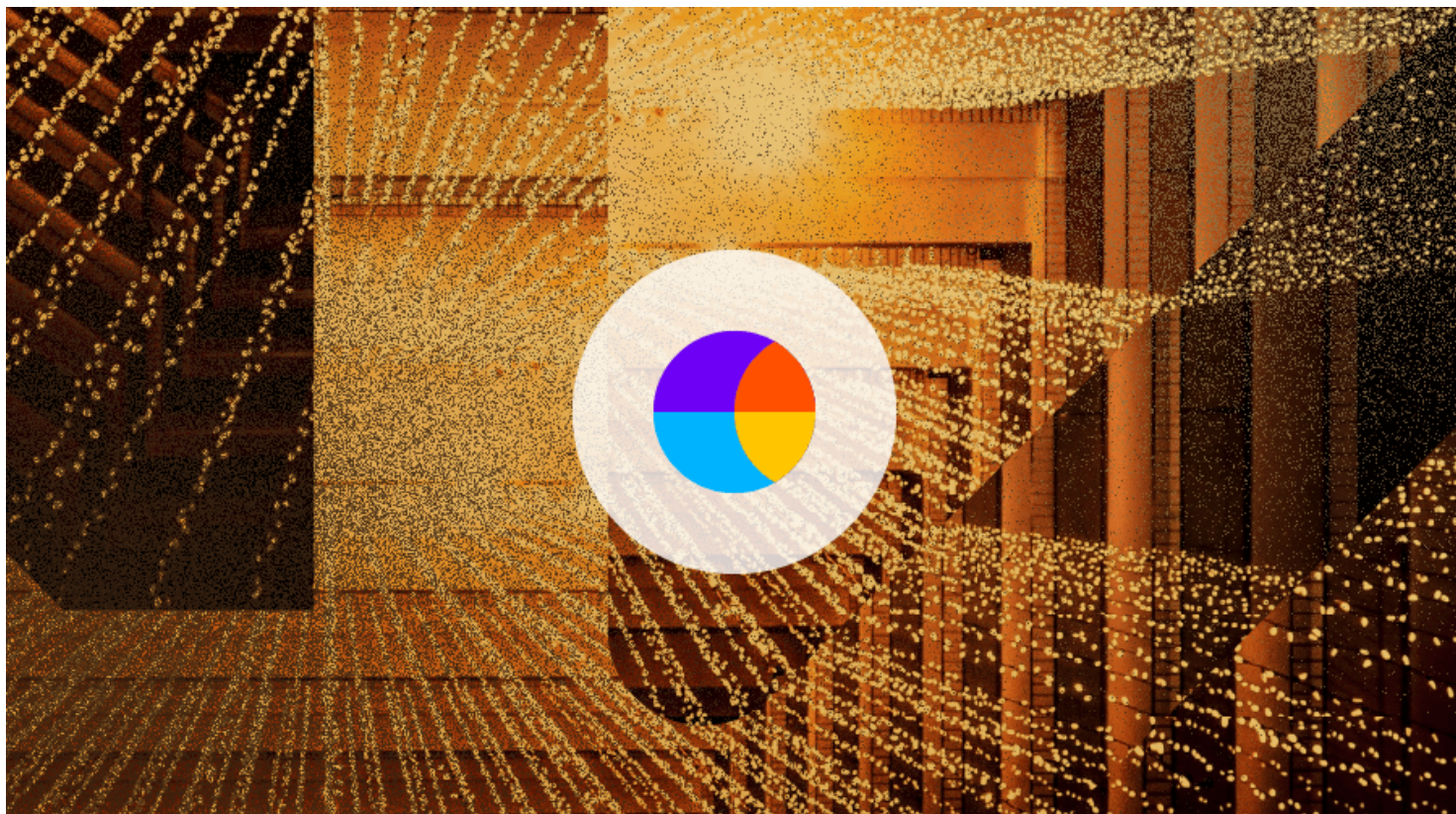


- [Vendor Privacy Program](#)
- [Volkswagen Car-Net & Audi Connect](#)

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 #177-2024: Global Strong, LLC d/b/a Lovvare](#)

Case #177-2024: Monitoring Inquiry – Global Strong, LLC d/b/a Lovvare

BBB NATIONAL PROGRAMS

Direct Selling Self-Regulatory Council

Case #177-2024: Monitoring Inquiry – Global Strong, LLC d/b/a Lovvare

Company Description

Lovvare ("Lovvare" or "Company") is a direct selling company that sells nutritional and wellness products. The Company is headquartered in Sheridan, Wyoming.

Basis of Inquiry

The Direct Selling Self-Regulatory Council ("DSSRC") is a national advertising self-regulation program administered by BBB National Programs. This matter was commenced by DSSRC pursuant to DSSRC's ongoing independent monitoring of advertising and marketing claims in the direct selling industry.

This inquiry concerned three product claims disseminated on Facebook by salesforce members and five earnings claims disseminated on Facebook and on the Company's website. DSSRC was concerned that the product claims communicated the message that the Company's products are efficacious in addressing serious health-related conditions. DSSRC was also concerned that the earnings claims conveyed unsupported claims regarding the income a typical salesforce member could earn from the Company's business opportunity including

claims that the typical salesforce member could earn significant or full-time income through the Company's business opportunity.

The representative claims identified by DSSRC in this inquiry were as follows:

Product Claims

- “So on this COLLAGEN for a month that my friend Carey told me about after the VA threw fibro-antidepressant meds at me for my fibromyalgia, joint issues and perimenopause symptoms !
And if you know me, I wasn't having any of that. So I found an ALL-NATURAL -BASED NANO solution!!!
What has changed in ONLY one month??!?!?!?!
Amazing smooth skin
Thicker Hair and a new cowlick too
Joints feel a little better-I do feel it when I DONT take it!!!
Symptoms of perimenopause GONE-ALL of them!!!
And this is just the beginning!!
When I told my friend about these she said “it's literally reversing your age from the INSIDE-OUT!”
if you have joint aches and pains, hair loss, stress, our Collagen and Silver is the BEST OUT THERE NOW!!! PM me for more info or comment”
(Facebook post)
- “Respiratory health:
Silver can help support respiratory health by reducing inflammation in the lungs and fighting off harmful pathogens that can cause respiratory infections.
Antiviral & Anti-fungal:
Can help fight off certain viruses and fungal infections while reducing the severity of viral infections and fungal overgrowth in the body.
Cardiovascular Health:
Silver can help support cardiovascular health by reducing inflammation in the arteries and improving blood flow
Reduce Inflammation:
Silver can naturally reduce inflammation throughout the body, potentially helping to alleviate symptoms of conditions such as arthritis and asthma.”
(Facebook post)
- “Has anyone tried Turmeric for Psoriasis? I've been taking it in a Trimbiotic Supplement from Lovvare with good results”
(Facebook post)

Earnings Claims:

- “You can thank me when you achieve the financial freedom you deserve.”
(Facebook post)
“Want to get paid for helping improve peoples quality of life?
Do you dislike the 9-5 grind?
Do you find it less than rewarding sitting in an office all day?
Want to earn enough income to cover all your family's supplements?
Want to be able to work from anywhere that has internet access on your own time?
Are you passionate about healthy living?
Then Lovvare may be for you
You can earn up to
\$50,000 PLUS”
(Facebook post)
- “Be a part-time Lovvare enthusiast or turn this venture into your next full-time gig”
(Statement on Company website)
- “help you create your own flexible, fulfilling path—so you can earn what you need”
(Statement on Company website)
- “Whether you want the chance to earn a little extra income to help pay your bills or build a long-term home-based business, the possibilities await you at Lovvare”
(Statement on Company website)

Company Position

The Company did not attempt to substantiate the product or earnings claims at issue in this inquiry. The Company informed DSSRC that

none of the individuals responsible for the posts at issue were current salesforce members with the Company or associated in any way with the Lovvare brand. In addition, the Company informed DSSRC that it strives to ensure that all income claims will strictly adhere to the guidelines set out by the Federal Trade Commission. To ensure compliance and transparency, the Company stated that no member of its team will be allowed to post anything on social media related to Lovvare without written approval and that failure to comply with this policy may result in immediate removal from the Lovvare salesforce. The Company underscored that it understands the importance of maintaining accurate and compliant advertising practices and that it is committed to upholding the highest standards.

The Company was successful in having two of the three product claims at issue removed from social media. Of the two earnings claims that appeared on social media posts, the Company was successful in having one of the posts removed. As to the one product claim and one earnings claim that remain accessible on social media, the Company wrote to the individuals responsible for disseminating the posts and requested that they have the posts removed.

The remaining three earnings claims appeared on the Company's Brand Ambassador page on its website. As to those claims, the Company informed DSSRC that it would update the website to address the areas of DSSRC's concern.¹

Analysis

DSSRC acknowledged the actions taken by the Company to effectuate the discontinuance of two of the three product claims and one of the two earnings claims that appeared on social media. In the absence of any effort by the Company to substantiate those claims, DSSRC determined the Company's actions to be necessary and appropriate.

With respect to the one remaining product claim and one remaining earnings claim that appeared on social media, DSSRC acknowledged the Company's efforts to contact the former salesforce members responsible for the posts and request that they remove such posts.

However, as DSSRC informed Lovvare during the inquiry, DSSRC recommends that the Company take additional steps to have those posts removed from social media. While DSSRC recognizes that removing social media posts that were communicated by inactive salesforce members can be a challenging endeavor for direct selling companies, in previous self-regulatory inquiries DSSRC has also recommended that the Company take additional steps to remove such claims from the marketplace, including utilizing any mechanism that social media platforms may have for removal of trademark or copyright violations and/or contacting the website or platform in writing to request removal of the subject claim or post. Accordingly, DSSRC recommends that Lovvare contact the platform on which the claims were disseminated in writing to request that they be removed. DSSRC also requests that Lovvare provide DSSRC with copies of such written correspondence.

DSSRC notes that companies in past DSSRC inquiries have also posted a comment on the applicable social media platform indicating that the subject post is not authorized by the company and that it has requested that the individual responsible for the post have it removed.

The three earnings claims that appeared on Lovvare's Brand Ambassador page on its website ("Be a part-time Lovvare enthusiast or turn this venture into your next full-time gig," "help you create your own flexible, fulfilling path—so you can earn what you need," and "Whether you want the chance to earn a little extra income to help pay your bills or build a long-term home-based business, the possibilities await you at Lovvare") remain available and substantively unchanged.² In addition to the three representative claims identified in DSSRC's Notice of Inquiry, DSSRC has similar concerns about a representation on the Company's website stating that "we allow you to be your own boss and provide you with the compensation plan to help you meet your goals."

Pursuant to the DSSRC Guidance on Earnings Claims for the Direct Selling Industry ("the DSSRC Guidance"), DSSRC cautions direct selling companies and their independent salesforce members against the use of any words or images communicating that a direct selling business opportunity will result in earnings beyond what can be generally expected by the typical salesforce member in the depicted circumstances. Moreover, section 6(c) of the DSSRC Guidance, notes that "... some words and phrases are prohibited when made to 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."³ Accordingly, DSSRC recommends that Lovvare discontinue the following claims on its website i) "turn this venture into your next full-time gig," ii) "so you can earn what you need," iii) "or build a long-term home-based business, the possibilities await you at Lovvare" and iv) "we allow you to be your own boss and provide you with the compensation plan to help you meet your goals."

Conclusion

As to the one product and one earnings claim at issue in this inquiry that remain available on social media, DSSRC recommends that Lovvare contact the platform on which the claims were disseminated in writing to request that they be removed and provide DSSRC with copies of such written correspondence. DSSRC also noted that companies in past DSSRC inquiries have posted a comment on the applicable social media platform indicating that the subject post is not authorized by the company and that it has requested that the individual responsible for the post have it removed.

As to the earnings claims that appear on Lovvare's Brand Ambassador page on its website, DSSRC recommends that Lovvare discontinue the claims stating i) "turn this venture into your next full-time gig," ii) "so you can earn what you need," iii) "or build a long-term home-based business, the possibilities await you at Lovvare" and iv) "we allow you to be your own boss and provide you with the compensation plan to help you meet your goals."

Company Statement

Editor's Note: At the conclusion of this inquiry, Lovvare declined to provide a Company Statement. Instead, the Company informed DSSRC that it was exiting the direct selling channel in the United States and, thus, would not be disseminating claims in the future. DSSRC will continue to monitor the marketplace to verify Lovvare's representation.

(Case #176, closed on 10/09/24)

© 2024 BBB National Programs

[1] To date, the claims remain unchanged on the Lovvare's Brand Ambassador page.

[2] The claim "so you can earn what you need" was revised to "so you can be compensated for what you need."

[3] Section 6 of the DSSRC Guidance further states that "Some 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,' and 'time freedom.'"

October 28, 2024

Subscribe to Stay Up-to-Date



Email*

First name*

Last name*