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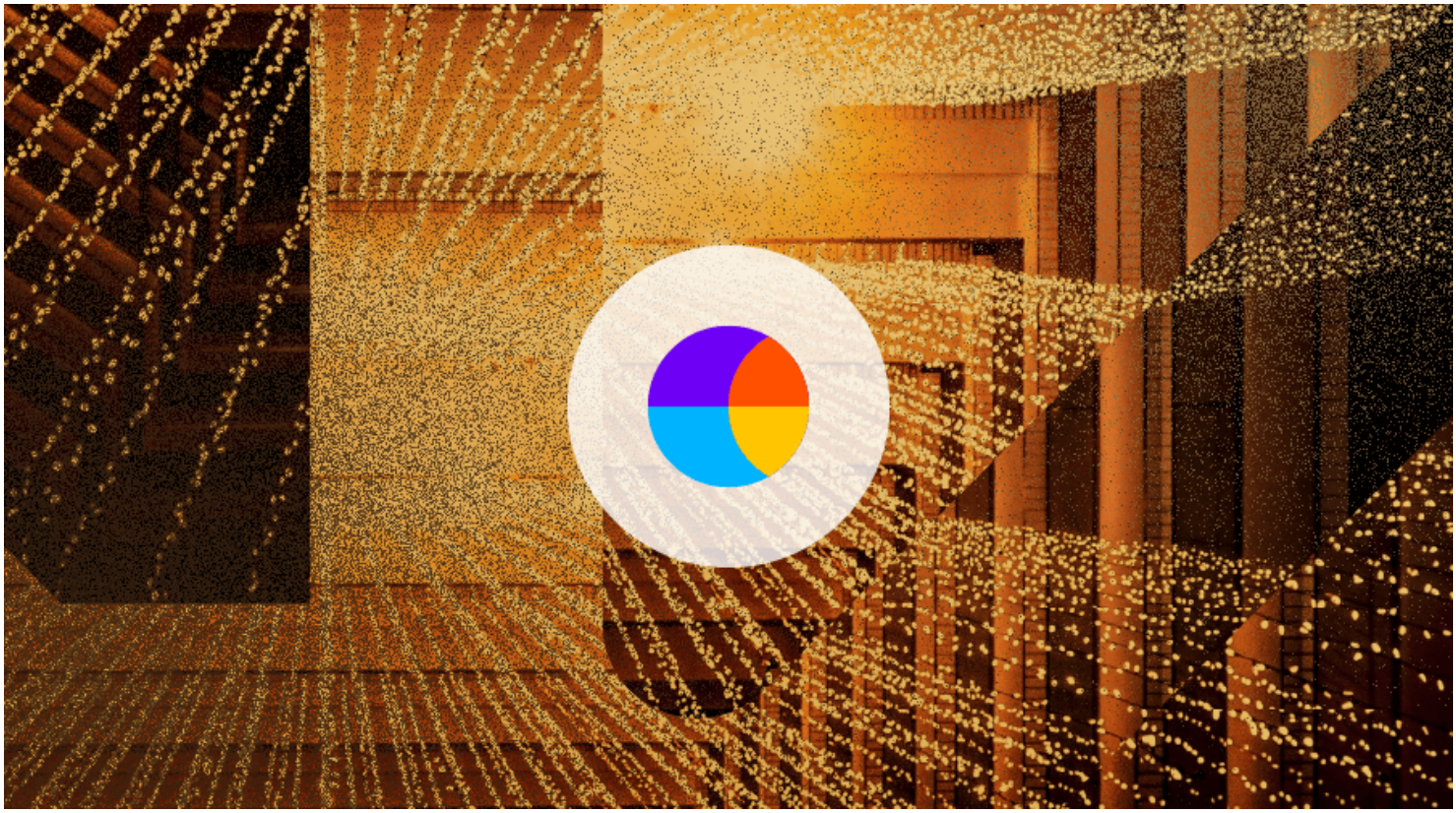

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1. Home
2. Programs
3. Advertising Self-Regulation
4. Direct Selling Self-Regulatory Council (DSSRC)
5. Case Decisions
6. Case #202-2025: L’BRI PURE n’ NATURAL

Case #202-2025: Administrative Closure - L’BRI PURE n’ NATURAL

BBB NATIONAL PROGRAMS

Direct Selling Self-Regulatory Council
Case #202-2025: Administrative Closure - L’BRI PURE n’ NATURAL

Company Description

L’BRI PURE n’ NATURAL (“L’BRI” or the “Company”) is a direct selling company headquartered in Mukwonago, Wisconsin and founded in 1998. The Company specializes in aloe-based cosmetics and skincare 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.

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

Earnings Claims

1. ".... being a consultant gives me the flexibility to work around my family's schedule and earn a great income. My goal is to keep sharing this aloe-amazing product and provide financial security for my family." https://lbri.com/klehman/about-me
2. "I wanted a career that I could feel good about myself, the work I was doing, help others and be able to give back. What I wanted was to be in control of my destiny. The L'BRI business opportunity has given me the financial freedom to set my work schedule around my personal life and my ever evolving and growing family. I LOVE this flexibility. L'BRI affords me the financial freedom to provide more for my family and to give back to the community where we live."
3. ""**Unlimited Earning Potential**: With MLM, your income isn't capped. As you build your network and sales grow, your earning potential can skyrocket. The more effort you put in, the more you can reap!" (August 2024)
4. "Whether you're looking to earn a little extra cash or embark on a new full-time career, you'll have everything you need - right from the start!" (May 2020)
5. "L'Bri offers unlimited potential for growth and income, making it an ideal partner for those who wish to take control of their destiny and build a successful business."
6. "I was earning money without doing anything!... My income started at about $500 a month to $1000! My first thought was L'BRI is a great residual income!" (May 2020)
7. "Financial Freedom with Aloe Skincare...L'BRI Pure n' Natural...Everything you need to start working for the best boss in the world...yourself!!!"

Company's Position

L'BRI did not attempt to substantiate the claims identified in this inquiry but instead took action to have the claims modified or removed from social media.

L'BRI successfully addressed all seven claims in this inquiry—five were removed from social media and two were modified.

With regard to the modified claims, the Company put forth a good faith effort to remove the language at issue. Before publishing the modified claims, L'BRI also sought additional guidance from DSSRC to ensure that the revised claims were adequately communicated.

The Company emphasized its efforts to ensure its salesforce members disseminate claims in compliance with the relevant regulatory standards. In particular, L'BRI noted that the Company's Policies and Business Parameters are provided to salesforce members at the time of their enrollment, which informs them that making any expressed or implied income claims are prohibited.

Moreover, the Company expressed its commitment to building upon its compliance efforts. L'BRI noted that it plans to include more in-depth in-person training for salesforce members at the Company's leadership event in January 2025. The Company also partnered with a third-party monitoring service to identify problematic representations made by its salesforce and address any claims not in compliance.

Administratively Resolved Resolution

DSSRC expressed its appreciation to L'BRI for their good faith efforts in removing the claims at issue in this inquiry. DSSRC determined that the Company's actions were necessary and appropriate.

DSSRC determined that the claims at issue in this inquiry communicated the message that a typical L'BRI salesforce member could earn a significant income (i.e., "unlimited earning potential" career-level income and "financial freedom") through the Company's business opportunity.

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."[1] The FTC Guidance notes that claims of unlimited earning potential or career level earnings are atypical to what the average participant would earn.[2] Thus, disseminating atypical earnings claims may create a deceptive impression about the business opportunity. In this regard, a participant in an MLM or direct selling opportunity must have a reasonable basis for making an income or earning claim. 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."[3]

The DSSRC Guidance on Earnings Claims for the Direct Selling Industry ("the DSSRC Earnings Claim Guidance") similarly cautions direct selling companies and their independent salesforce members against the use of language or images that communicate "earnings beyond what can be generally expected by the typical salesforce member in the depicted circumstances."[4] The DSSRC Earnings Claim Guidance further notes that claims of "unlimited income" should be avoided when communicated to current and perspective salesforce

embers.[5] Moreover, "[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…".[6]

In the present inquiry, L'BRI took action to contact the salesforce members responsible for the earnings claims identified by DSSRC. The company was successful in removing five claims from social media. Moreover, the Company successfully modified two of the claims identified by DSSRC which were found on the independent salesforce members' L'BRI affiliated webpages.[7]

Conclusion

Based upon L' BRI's good faith efforts to modify and remove the seven total claims identified by DSSRC in this inquiry, DSSRC administratively closed its inquiry.

Company Statement

"L'BRI is proud of the reputation of excellence and integrity we have earned with our consultants, customers, and peers in the industry. We remain committed to supporting a strong culture of compliance by providing our sales force with education and clear guidance to conduct their business ethically and in accordance with L'BRI policies and regulatory standards."

(Case #202, Closed on 3/10/25)
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[1] *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.

[2] *Id*. at Section 13.

[3] *Id*.

[4] Direct Selling Self-Regulatory Council, Guidance on Earnings Claims for the Direct Selling Industry, General Principles (2022). dssrc_guidanceonearningsclaimsforthedirectsellingindustry.pdfGeneral principles

[5] *Id*. at Section 6

[6] Direct Selling Self-Regulatory Council, Guidance on Earnings Claims for the Direct Selling Industry, Section 6(A) (2022). dssrc_guidanceonearningsclaimsforthedirectsellingindustry.pdf

[7] The Company's independent salesforce members are given their own links to the L'BRI website. Accessing these links provides information about the specific salesforce member and lists what L'BRI products the member is selling.

3.19.25

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