

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

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[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 #201-2025: Life Health Universal USA, LLC d/b/a Lifehuni](#)

Case #201-2025: Administrative Closure - Life Health Universal USA, LLC d/b/a Lifehuni

BBB NATIONAL PROGRAMS

Direct Selling Self-Regulatory Council

Case #201-2025: Administrative Closure - Life Health Universal USA, LLC d/b/a Lifehuni

Company Description

Life Health Universal USA, LLC d/b/a Lifehuni (“Lifehuni” or “the Company”) is a direct selling company founded in 2005 based in Miramar, Florida. The Company markets natural health products, including dietary supplements formulated with natural extracts and medicinal plants.

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 four earnings claims and two product performance claims disseminated on the company website, Instagram, and Facebook. DSSRC was concerned that these claims conveyed the message that the typical Lifehuni salesforce member can generally expect to earn significant income from the Company’s business opportunity and that Lifehuni products are efficacious in addressing serious health-related conditions.

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

Earnings Claims:

1. “Unlimited Income” and “Financial Freedom (Translated from Spanish)”
2. “Life and Financial Freedom”

[00:57] Financial Freedom (translated from Spanish) and alludes to Lavish Lifestyle Trips

3. “The possibility of earn great profits with a little initial investment. Have the opportunity to generate a very high level of residual income” (Question #7) and

“We offer a budget template to create your own financial freedom.” (Question #8)

4. “It's time to be part of Lifehuni and enjoy your success, well-being and financial freedom” (Instagram)

Product Claims:

1. “With this natural supplement you can also: 🍌 Reduce the progression of Alzheimer's and Parkinson's, 🍌 help prevent osteoporosis. 🍌 Fight asthma and diabetes. 🍌 Fight liver disorders and cancer.” (Facebook - November 2021)
2. “Benefits of Divi Her & Maca Life Kit ... - Decreases anxiety to eat between 17% to 30%.; Regulates cholesterol and blood sugar levels; Decreases menstrual and menopausal disorders. Prevents heart disease.” (Facebook - August 2023)

Company’s Position

Earnings Claims

The Company explained that claims #1 and #2 in the subject inquiry were communicated on websites that are not affiliated with or managed by Lifehuni and that the website appears to reference Lifehuni’s business without authorization. The Company informed DSSRC that it has taken steps to reach out to the administrators of these pages, requesting their immediate removal or correction of the unauthorized content.

Lifehuni was successful in facilitating the removal of the related Instagram post identified by DSSRC.

With respect to the two remaining earnings claims identified by DSSRC (see claims listed as #3 in the Basis of Inquiry), the Company explained that its website was completely revised last year and the claims at issue have been removed.

Lifehuni was also successful in facilitating the removal of the related Instagram post identified by DSSRC.

Product Performance Claims

Lifehuni stated that the two product performance posts identified by DSSRC were not made or authorized by the Company and the claims were disseminated by independent third parties without the Company’s knowledge or consent. Upon becoming aware of these posts, Lifehuni immediately contacted the administrators of the respective pages and had the posts removed.

Lifehuni informed DSSRC that it requires that all product claims made by authorized representatives or distributors be substantiated by competent and reliable scientific evidence. The Company explained that its marketing materials include only substantiated claims, with clear disclaimers stating that Lifehuni products are not intended to diagnose, treat, cure, or prevent any disease.

The Company noted that, as a result of the DSSRC inquiry, it has strengthened its distributor training to ensure that salesforce members understand the importance of avoiding unauthorized or exaggerated health claims. In addition, Lifehuni has implemented additional safeguards to identify and address any unauthorized claims made by third parties. This includes a reporting system for monitoring external references to the Company’s products or business.

Administrative Closing Determination

Earnings Claims

DSSRC confirmed that the Lifehuni website (<https://www.lifehuni.com/usa/>) has undergone a complete revision and does not include claims of “unlimited income” or “financial freedom.”¹ Moreover, DSSRC verified that the FAQ section of the website does not include claims referencing “great profits” and that the Instagram post at issue has been removed.

DSSRC determined that the Company’s voluntary actions to reconcile the earnings claims were necessary and appropriate. As stated in the Federal Trade Commission’s (FTC) Business Guidance for Multi-Level Marketing (“the FTC Guidance”), “any earnings claim should reflect what the typical person to whom the representation is directed is likely to achieve in income, profit, or appreciation.”² Moreover, “[a]n MLM or 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.”³ 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.⁴ Therefore, presenting atypical earnings “is likely to generate a deceptive impression” of the earning potential of a given business opportunity.⁵

The DSSRC Guidance on Earnings Claims for the Direct Selling Industry (“the DSSRC Earnings Claim Guidance”) addresses the issue of “unlimited income” claims by stating that such claims should be avoided when communicating with prospective or current salesforce members.⁶ The DSSRC Earnings Claim Guidance explains 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.⁷ The DSSRC Earnings Claim Guidance further notes 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...”⁸

Product Performance Claims

Lifehuni did not attempt to substantiate the health and safety claims communicated in the two Facebook posts and, as such, DSSRC concluded that the Company’s actions to have the posts removed were warranted.

It is well-established that claims concerning the efficacy of health products should be supported by competent and reliable scientific evidence. In its recently published Health Products Compliance Guidance, the FTC defines competent and reliable scientific evidence as “tests, analyses, research, or studies that (1) have been conducted and evaluated in an objective manner by experts in the relevant disease, condition, or function to which the representation relates; and (2) are generally accepted in the profession to yield accurate and reliable results.”⁹ The FTC also requires that research must be “sufficient in quality and quantity based on standards generally accepted in the relevant scientific fields, when considered in light of the entire body of relevant and reliable scientific evidence, to substantiate that the representation is true.”¹⁰

In the absence of such evidence, DSSRC determined that Lifehuni appropriately took steps to facilitate the removal of the two social media posts that included the unsupported product performance claims.

DSSRC appreciated the immediate steps taken by Lifehuni to address its concerns in this inquiry and, based upon the good faith efforts demonstrated by the Company to remove all of the claims at issue, DSSRC administratively closed its inquiry.

Company Statement

“Lifehuni is committed to ethical business practices, transparency, and compliance in all aspects of our operations. We take great pride in maintaining the trust of our customers and independent salesforce. As part of our ongoing efforts, we continuously provide training and resources to ensure that all promotional materials and communications align with industry standards and regulatory guidelines. Our team remains dedicated to monitoring and addressing any concerns to uphold the integrity of our brand.”

(Case #201, closed on 02/25/25)
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[1] DSSRC also expressed its appreciation to the Company for its ongoing efforts to contact the administrators of third-party websites who make unauthorized references and claims on behalf of Lifehuni.

[2] *See* Fed. Trade Commission, 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.*

[4] *Id.* at Section 13.

[5] *Id.*

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

[7] *Id.* at Section 6.

[8] *Id.* at Section 6(A).

[9] Fed. Trade Commission, Health Products Compliance Guidance, Section B. Substantiating Claims, 12. https://www.ftc.gov/system/files/ftc_gov/pdf/Health-Products-Compliance-Guidance.pdf

[10] *Id.*

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