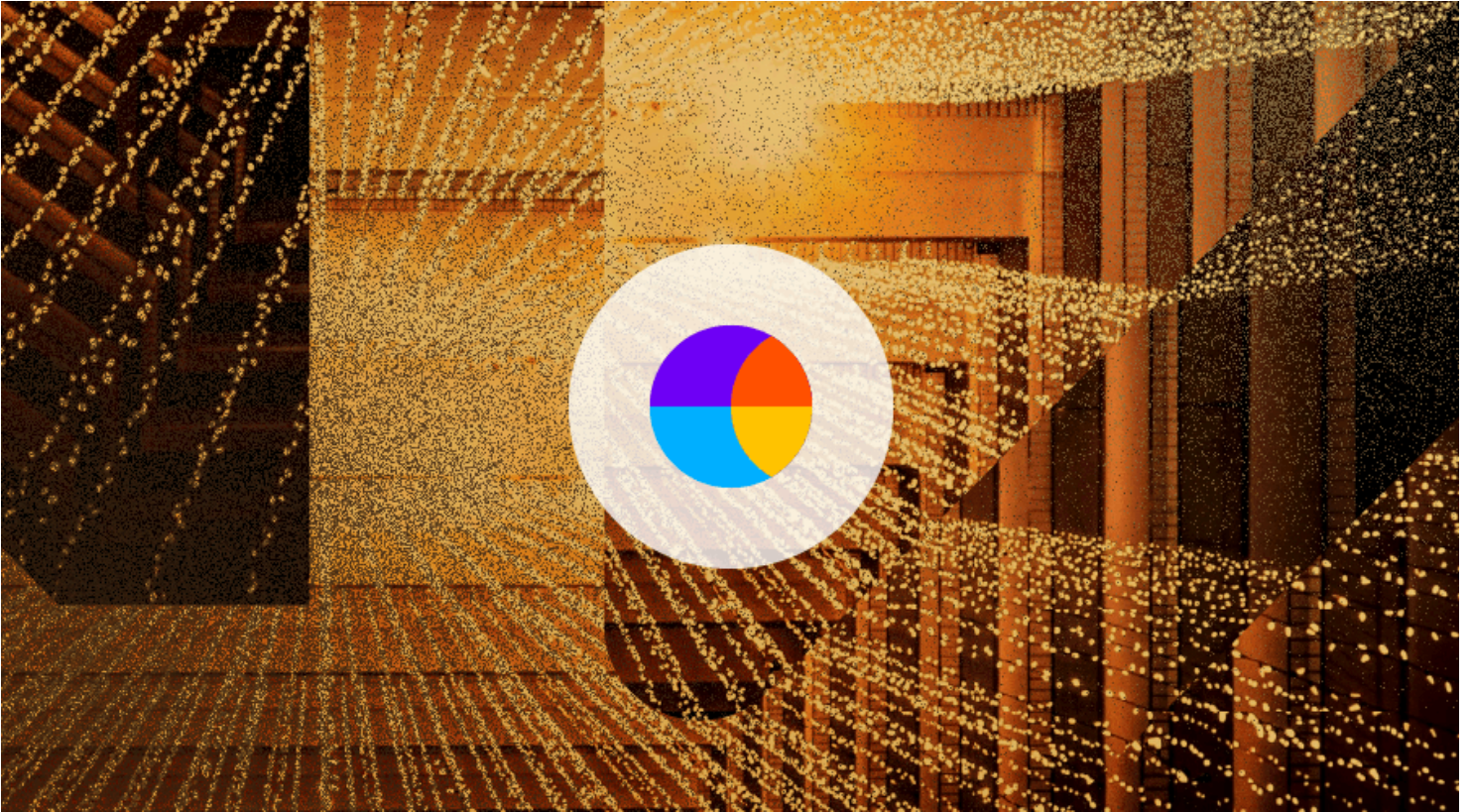


- [RMAI Services](#)
- [TeenAge Privacy Program](#)
- [Vendor Privacy Program](#)
- [Volkswagen Car-Net & Audi Connect](#)

## 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 #239-2025: Global Organics Merchants, LLC d/b/a LoveBiome](#)

# Case #239-2025: Monitoring Inquiry – Global Organics Merchants, LLC d/b/a LoveBiome

## BBB NATIONAL PROGRAMS

Direct Selling Self-Regulatory Council

Case #239-2025: Monitoring Inquiry – Global Organics Merchants, LLC d/b/a LoveBiome

## Company Description

Global Organics Merchants, LLC d/b/a LoveBiome (“LoveBiome” or the “Company”) is a direct selling company founded in 2022 and based in Provo, Utah. The Company markets products targeting the microbiome health/gut wellness space.

## Basis of Inquiry

The Direct Selling Self-Regulatory Council (DSSRC) is a national advertising self-regulation program administered by BBB National Programs. DSSRC initiated this inquiry in response to an issue raised by a consumer and through DSSRC's ongoing independent monitoring program, which reviews the advertising and marketing claims made by direct selling companies and their salesforce members.

This inquiry pertained to 15 earnings claims and five product performance claims disseminated by Company salesforce members on Facebook, Instagram, and on the Company website. DSSRC was concerned that the earnings claims that were the subject of this inquiry communicated the message that the typical LoveBiome salesforce member can earn significant income and incentives through the Company's business opportunity and that the Company's products can effectively treat several health conditions.

The representative claims that formed the basis for DSSRC's inquiry are set forth below:

### *Earnings Claims*

1. "This is my mentor and sponsor in LoveBiome, Dr Tamia Bethea Williams. Please listen to her wisdom and then message me for details on how you can work directly with her and me! Good health and financial freedom is there for the taking!!" (May 2025)
2. "Trips, travels... your best life, healthy life and financial freedom. Let me show you how, inbox us now!!! #financialfreedom"
3. "Financial Freedom for health entrepreneur" (April 2025)
4. "For many individuals facing financial challenges, the quest for stability is a top priority. LoveBiome offers a pathway to financial freedom that can alleviate the stress and anxiety associate with financial uncertainty." (April 2025)
5. "Calling everyone who is looking for financial freedom to join me on this corporate zoom happening in less than an hour!... HISTORY IS UNFOLDING TODAY in LoveBiome - COME AND CELEBRATE with us - our company has already paid millions out! This is the best compensation plan that I've seen" (April 2025)
6. "What's your 3-5yr game plan for financial freedom!
  - o Content of the Facebook Reels video: "If I wanted to make an additional \$1,000 a month, I need to refer 38 customers on one of these two systems, if I wanted to make an additional \$5,000 a month, that'll be 192 people on these two systems... If I wanted to create an additional \$30,000 a month in residual income for myself I'd need 1,154 customers every single month just drinking this product. Now you know if I kinda wanna cut that thing in half and I really wanna put some momentum to it, I'm gonna go out there and build a team... generate you 3 million dollars a month. Let's say you mess that up 90%, would \$300,000 a month change your life?"
7. "Are you looking for more income!?"

What if I told you, I can get you starting out making \$300-500 per month?

I have solutions to your problems and can get you living a more free and happy life in helping to share the brand LoveBiome with real potential making \$10k-\$20k months. ✨ Not only that, but you'll get our best pricing, cool swag and merchandise, and invitations to life-changing incentive trips!

You don't have to struggle financially anymore and be miserable. My job is to coach you and lead you to a better future for you and your loved ones. 💖" (October 2023)

8. "I'm looking for similar minded people who want to achieve financial freedom from helping the world get healthy!!... #financialfreedom" (December 2024)
9. "This is your chance to be self-employed, work from anywhere, and achieve financial freedom while making a positive impact on others' health. Plus, you'll be part of a supportive community that helps you succeed."
  - o Accompanying video:
    - "as well as take steps on the path to financial freedom"
    - "Our business, in the era of the microbiome, can help you create an income stream that will last you a lifetime" (August 2024)
10. "P84 has ignited such belief, interest and success that we can see it will be a path for Hundreds and eventually Thousands to become Financially Free."
  - o post includes pictures of affiliate earnings with LoveBiome (April 2025)
11. "2025 is the Year of Financial Freedom with Love Biome. Do You Want to Learn More About the Amazing Opportunity P84 Presents in Realizing Your Financial Freedom?" (April 2025)
12. "Whether you just want to get your product for free or you want to earn a little side money, becoming a LoveBiome Affiliate is the easiest step towards financial freedom"
13. "The LoveBiome Affiliate Program is an easy way to share our products and earn commissions. Not only that, but you'll get our best pricing, cool swag and merchandise, and invitations to life-changing incentive trips!"
14. "I am also convinced that our Founders WILL again help 100's of people into multi millionaire status like they have done before! That many in my team will be financially free by the end of this year," (January 2025)
15. "the opportunity to make as much 💰💰 as my big bank account can hold!" (March 2025)

### *Product Performance Claims*

1. “Struggling with anxiety, brain fog, or mood swings? Your gut might be the reason!
  - Your gut and brain are deeply connected, and when your gut is out of balance, it can affect your mood, stress levels, and even sleep. An unhealthy gut can lead to:
  - 😞 Increased anxiety & depression
  - 🌀 Brain fog & trouble focusing
  - 😴 Poor sleep & low energy
  - 😡 Mood swings & stress overload
  - 🌿 The good news? A healthy gut = a healthier mind! Supporting your digestion with probiotics, prebiotics, and phytonutrients (like P84! 😊) can help boost your mood, reduce stress, and clear your mind.” (March 2025)
2. “Consuming PhytoPower W daily will populate the gut with friendly targeted probiotics and supply vital prebiotic soluble fiber to nourish the probiotics. With regular consumption, PhytoPower W will deliver some impressive benefits:”
3. “Helps body product short-chain fatty acids
  - Aids in digestion
  - Regulates appetite.
  - Helps body harvest fewer calories from fat
  - Increases metabolism activity and fat-burning”
4. “PhytoPower T will deliver some impressive benefits: \* • Break down starch • Jumpstart fat burning • Target excess fat • Improve baseline metabolism • Increase amyolytic activity”
5. “From a size 12 to a size 6!! From almost 200lbs to fun-sized 😊👗 Shirts too big. Shoes too loose. Time for a new wardrobe! 🔥 Started my journey on Dec 1, 2024 📦 Daily consistency with:
  - A ✅ P84 (the ultimate 10-in-1 gut health formula);
  - B ✅ PhytoW – for balance and hormone support;
  - C ✅ PhytoT – for total body detox; ✅ PhytoB – brain and mood support; My body responded. My energy shifted. My confidence LEVELLED UP. This isn’t just weight loss—it’s gut restoration + glow-up!” (June 2025)

## Company’s Position

### Earnings Claims

LoveBiome stated that its Policies and Procedures explicitly outline the responsibility of salesforce members to refrain from making improper or misleading income claims.<sup>1</sup>

The Company acknowledged that statements referencing travel rewards, specific income amounts (such as “\$300–\$500 per month” or “\$30,000 a month”), as well as terms like “wealth,” “elite,” and “multi-millionaire status,” constituted substantive earnings representations that had not been authorized. The Company reported that it worked with its salesforce members to ensure that such posts were modified or removed. It further noted that several of the earnings claims identified by DSSRC had been made by individuals who are no longer affiliated with the organization.

The Company asserted that most references by its salesforce members to “financial freedom” were intended to be aspirational in nature rather than guarantees of specific income outcomes. Notwithstanding, in the spirit of voluntary self-regulation, LoveBiome indicated that it has made changes to remove “financial freedom” and “life-changing” statements from its marketing.

To further promote transparency and full disclosure regarding the LoveBiome business opportunity, the Company informed DSSRC that it has revised its Income Disclosure Statement and will ensure that it is easily accessible and linked on the LoveBiome website. In addition, the Company has incorporated links to the updated statement within its compensation plan and its Policies and Procedures. LoveBiome also indicated that compliance with earnings representation standards will be reinforced through training at its annual events and during Company-sponsored online distributor meetings held at least quarterly.

### Product Performance Claims

The Company acknowledged that many of the claims identified by DSSRC did not constitute appropriate structure/function claims. LoveBiome agreed that its salesforce members should refrain from referencing disease conditions—such as anxiety or depression—and from suggesting that the Company’s products can treat or alleviate such conditions.

LoveBiome further committed to addressing the weight-loss claims disseminated by its salesforce members and informed DSSRC that it is modifying prior references to burning excess fat and similar weight loss statements, particularly when not coupled with change of diet and exercise efforts.



The Company stated that its products are supported by substantiated, Company-approved structure/function claims and informed DSSRC that it will reinforce these approved statements during annual events and quarterly online distributor trainings.

In addition, LoveBiome prepared a comprehensive list of permissible structure/function claims to educate its distributors on proper product descriptions and is actively working with both current and former distributors to revise, correct, or remove any improper therapeutic claims from social media and other marketing materials.

## Analysis

LoveBiome did not attempt to support the 15 earnings claims and five product performance claims with substantive data, but, instead, elected to use its best efforts to remove the posts and claims. DSSRC determined that the Company's actions were necessary and appropriate.

### *Earnings Claims*

According to the FTC's *Business Guidance Concerning Multi-Level Marketing* (the "FTC MLM Guidance"), an MLM's or its participant's representations related to the business opportunity, including earnings claims, violate Section 5 of the FTC Act if they are material to consumers and false, misleading, or unsubstantiated, and any earnings claim should reflect the amount of income that the typical person to whom the representation is directed is likely to earn from the business opportunity.<sup>2</sup>

LoveBiome was successful in removing nine of the 15 earnings claims identified in this inquiry. During the pendency of the inquiry, the Company reached out to the salesforce members responsible for disseminating the earnings claims on social media and asked them to change the posts or have them removed.

LoveBiome represented to DSSRC that it had undertaken efforts to contact the salesforce members responsible for the six posts that remain publicly accessible. However, notwithstanding DSSRC's specific request, the Company did not furnish copies of the correspondence to substantiate its asserted good faith efforts. Furthermore, during the pendency of the inquiry, DSSRC sought clarification regarding whether the individuals responsible for the remaining posts continued to be active members of LoveBiome's salesforce. To date, no additional information concerning the status of those individuals has been provided.

As DSSRC has noted in numerous prior self-regulatory inquiries<sup>3</sup>, when individuals responsible for noncompliant social media posts identified in a DSSRC matter are confirmed to be active members of a company's salesforce and fail to comply with requests to remove or modify the non-compliant content, DSSRC has recommended that the direct selling company undertake appropriate enforcement measures in accordance with the Company's internal Policies and Procedures. Such measures may include, where warranted, the suspension or termination of the salesforce member's account to ensure adherence to company standards and to safeguard the integrity of its marketing practices. Conversely, where the content in question was posted by an individual who was an active salesforce member at the time of dissemination but is no longer active, DSSRC recognizes that the company may lack the ability to compel removal of the post. In those instances, DSSRC requests that the company furnish copies of any correspondence issued to the former salesforce members as documentation of a bona fide, good-faith effort to achieve removal of the content.

Lastly, if a claim by a former or suspended salesforce member appears on a website or platform without an available reporting mechanism, DSSRC recommends that the company contact the platform in writing to request removal of the post. Documenting these outreach efforts will serve as evidence of the company's proactive, good-faith compliance efforts. DSSRC has also observed that some direct selling companies have chosen to post public comments clarifying that the content was not authorized and that a formal request for its removal has been made.

With respect to claims suggesting financial independence or similar representations of financial stability as a result of participating in the direct selling business opportunity, DSSRC's *Guidance on Earnings Claims for the Direct Selling Industry* (the "DSSRC Earnings Claim Guidance") emphasizes that certain terms of this nature pose a heightened risk of misleading consumers when used without proper context. One example of such language includes, but is not limited to, "financial freedom."<sup>4</sup>

DSSRC expressed its appreciation to LoveBiome for its willingness to address claims of financial freedom communicated by its salesforce members and noted that express and/or implied claims presented in an unqualified context can often convey an ambiguous message to consumers and prospective salesforce members. Unless appropriately qualified, DSSRC has determined that it is reasonable for a consumer or potential business opportunity participant to interpret "financial freedom" in its express context – i.e., as meaning that participation in the direct selling opportunity will relieve financial worries or provide a transformative level of income.

DSSRC also further noted its concern regarding a section of the Company's webpage referencing LoveBiome's Affiliate Program and "invitations to awesome trips." DSSRC concluded that this language could reasonably lead consumers and potential salesforce members to believe that all expenses related to the trip—such as airfare and lodging—are fully paid by the Company. However, the Company did not confirm that these incentives are provided at no cost to the salesforce member, nor does the webpage include any further details clarifying the nature or extent of the reward.<sup>5</sup>

According to section 2(F) of the DSSRC Earnings Claim Guidance, for purposes of a DSSRC inquiry, an earnings claim is any claim, express or implied, communicated by either the direct selling company itself or by its independent salesforce members that conveys that salesforce members may earn or have earned company-sponsored incentives, including those lifestyle purchases (such as homes, vehicles, vacations) or other rewards.<sup>6</sup>

DSSRC cautions that any express or implied references to incentives that may reasonably be interpreted as free incentives will likely draw close regulatory scrutiny.

More specifically, pursuant to section 20 of the FTC's MLM Guidance "*MLMs and their participants should not suggest that a trip or car will be offered for "free" if the person will have to pay for the item... it is reasonable for someone to view a "free vacation" offer as providing for free all material costs of the vacation (like airfare, hotel, and a rental car). If that is not true, the MLM and its participants should either refrain from using the word "free" or from misstating what is "free." (For example, if only a free hotel room is being provided, the offer should specify that: "Free hotel room stay for X nights.")*."<sup>7</sup>

DSSRC has previously determined that when online content highlights atypical incentives that may be earned by company salesforce members, it should include a clear and conspicuous disclosure placed close to the claim specifying the percentage or number of company salesforce that has actually received the reward, as well as any other material details related to the incentive.<sup>8</sup>

Accordingly, DSSRC recommended that the claim on the LoveBiome website regarding incentive trips be removed or modified to include more details about the nature of the incentive trip as described above.

### *Product Performance Claims*

LoveBiome was successful in removing two of the five product performance claims identified by DSSRC. The three remaining claims are featured on the Company's website and include descriptive and substantive representations regarding the purported benefits that consumers may derive from the use of the Company's PhytoPower W and PhytoPower T products. The website references a range of health-related benefits, including, for PhytoPower T, claims related to the breakdown of starch, fat burning, reduction of excess fat, improvement of baseline metabolism, and enhancement of amylolytic activity; and for PhytoPower W, assertions concerning the production of short-chain fatty acids, support for digestion, regulation of appetite, reduction in caloric absorption from fat, and an increase in metabolic rate. However, the Company did not provide DSSRC with any data to support the health claims.

In addition to presenting product claims in a clear and truthful manner, advertisers are obligated to ensure that such claims are properly substantiated. According to the FTC, marketers must possess a reasonable basis for any express or implied product representation prior to dissemination. The nature of that reasonable basis depends on several factors, including the specific claim being made, the manner in which it is conveyed within the overall context of the advertisement, and the presence or adequacy of any qualifying language. The FTC's substantiation requirement is particularly stringent in the context of health-related representations and is intended to safeguard consumers by promoting confidence in the reliability and accuracy of advertising claims.<sup>9</sup>

When assessing efficacy or safety claims for health-related products, the FTC standard for substantiation is "competent and reliable scientific evidence." The FTC defines this standard as encompassing "tests, analyses, research, or studies that (1) have been conducted and evaluated objectively by qualified experts in the relevant disease, condition, or function addressed by the claim; and (2) are generally recognized by the pertinent scientific community as producing accurate and reliable results." Moreover, the FTC specifies that such evidence must be of sufficient quality and quantity—consistent with standards generally accepted within the applicable scientific disciplines and considered in the context of the totality of relevant scientific data—to substantiate that the advertising representation is truthful and not misleading.<sup>10</sup>

In summary, while DSSRC acknowledged and appreciated the Company's voluntary efforts to remove the social media posts with product performance claims disseminated by two of its salesforce members, it also recommended that, absent competent and reliable scientific evidence, the Company discontinue the use of substantive health-related claims concerning the purported benefits of its PhytoPower W and PhytoPower T products in the context presented on its website.

### **Conclusion**

LoveBiome voluntarily removed nine of the 15 earnings claims and two of the five product performance claims identified in the inquiry. With respect to the remaining earnings claims, DSSRC recommended that LoveBiome enforce its internal Policies and Procedures by taking appropriate action—such as suspension or termination—against any active salesforce members who fail to remove noncompliant posts. For inactive members, it was also requested that the Company provide DSSRC with documentation of its good-faith efforts to contact the salesforce members and social media platforms requesting removal of the posts. Additionally, DSSRC advised the Company to revise or remove website references to incentive trips that could be perceived as "free" and/or to include clear disclosures clarifying the terms and conditions of such incentives.

With respect to the product performance claims at issue, DSSRC acknowledged the Company's good-faith efforts to remove noncompliant social media posts, but recommended that, lacking competent and reliable scientific evidence, LoveBiome discontinue the health-related

claims for its PhytoPower W and PhytoPower T products currently displayed on its website.

## Company Statement

“LifeVantage, the new owner of the assets of Global Organics Merchants, LLC d/b/a LoveBiome as of October 1, 2025, actively supports industry self-regulation and is committed to upholding the highest compliance standards in the industry. Since becoming aware of this report, we have taken prompt action to address the remaining items cited therein including removal of the non-compliant materials and conducting compliance training for our new Consultants from LoveBiome.

In furtherance of our commitment to compliance, we maintain a robust compliance program, which includes continuous monitoring of our Consultant's online content, providing compliance tools to our Consultant's, conducting regular trainings on compliance topics and our policies and procedures, and enforcement of our policies and procedures where appropriate. We value the DSSRC's guidance and views and welcome continued collaboration with the DSSRC to resolve any matters brought to our attention.”

(Case #239, closed on 10/6/25)

© 2025 BBB National Programs

[1] More specifically, sections B.III and IV of LoveBiome Policies states the Company expects its distributors to “[p]resent the Compensation Plan . . . in a complete and accurate manner” and “[n]ot make exaggerated income claims.” This is reiterated in sections 3.13. (A)(IV), which states that distributors must “[r]efrain from making any unauthorized income projections, claims, or guarantees...”.

[2] See <https://www.ftc.gov/business-guidance/resources/business-guidance-concerning-multi-level-marketing>, section 13.

[3] See *pawTree, LLC*, DSSRC Case #158-2024; *Thrive Life, LLC*, DSSRC Case #138-2023; *Lemongrass Spa Products*, DSSRC Case #157-2024; *Lemongrass Spa Products*.

[4] See *dssrc\_guidanceonearningsclaimsforthedirectsellingindustry.pdf*, section 6(A).

[5] This section of the LoveBiome website does provide a hyperlink beneath the “awesome incentive trips” language that invites interested individuals to “Join Now,” but the link does not provide details about qualifying for the trip incentive and simply requests the user to provide information about the Company representative who referred them to the site.

[6] *Supra* at 4.

[7] *Supra* at 2, section 20.

[8] See *SeneGence International*, DSSRC Case #207-2025 and *MONAT Global Corp*, DSSRC Case #171-2024.

[9] Federal Trade Commission, *Health Products Compliance Guidance* (Dec. 20, 2022) (staff guidance), <https://www.ftc.gov/business-guidance/resources/health-products-compliance-guidance>, page 11.

[10] *Id* at page 12. As a general matter, substantiation of health-related benefits will need to be in the form of randomized, controlled human clinical testing to meet the competent and reliable scientific standard. In evaluating the reliability of such testing, the FTC will consider several parameters, such as sample size, duration, and outcome measures, that will vary depending on the exact nature of the hypothesis being tested and accepted norms in the relevant field. Assessing whether a study is well-designed and well-conducted, and whether the data has been properly analyzed and interpreted, are tasks that should be undertaken by someone with appropriate expertise. Marketers of health products are encouraged to consult with an independent expert in the relevant field of research. Independent experts can provide unbiased assessments of the validity of studies, how they fit within the relevant scientific literature, and what conclusions can be legitimately drawn from the results.

December 08, 2025

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