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Case #212-2025: Administrative Closure - MONAT Global Corp

BBB NATIONAL PROGRAMS

Direct Selling Self-Regulatory Council

Case #212-2025: Administrative Closure - MONAT Global Corp

Company Description

MONAT Global Corp (“MONAT” or the “Company”) is a direct selling company that sells haircare, skincare, and wellness products. The Company is headquartered in Doral, Florida and was founded in 2014.

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 and marketing claims in the direct selling industry.

The inquiry included 18 earnings claims that were disseminated by Company salesforce members on Facebook, with the exception of one post that was communicated on Instagram. DSSRC was concerned that the representative claims below communicate the message that the typical Monat salesforce member can generally expect to earn significant income from the Company's business opportunity.

Earnings Claims

Financial Freedom Claims

1. "This incredible business opportunity that not only has given me and my family some financial freedom but also given me purpose again with the flexibility to run it the way I want to, around my family and farm... How would an extra \$50, \$500, \$2000 a month make a difference in your life?"
2. "#financialfreedom"¹
3. "If you're ready for a life with flexibility, fulfillment, and financial freedom, let's chat! #FinancialFreedom"
4. "Financial freedom and flexibility...#financialfreedom"
5. When I started my journey with Monat, I knew I wanted more than just great hair care. I wanted FREEDOM—time freedom, financial freedom, and the lifestyle to live life on my own terms...#FinancialFreedom" (October 2024)

Unlimited Income Claims

1. "My dream is to retire from my full-time job and have a more flexible schedule, unlimited earning potential, be able to be there more for my family, and make a difference in the lives of my clients! Thankful for my Monat business that is slowly getting me to that dream."
2. "Uncapped Flexible Income - There is no income cap on the amount of money you can earn in this company...Your pay check is a direct reflection on the amount of work you put in." (November 2024)

Full Time/Replace Your Income Claim

1. "This is an incredible opportunity for anyone looking for supplemental income, full-time, part-time, or anytime, with no inventory required and no monthly sales quotas." (October 2024)

Quantified Earnings Claims

1. "With Monat, I get paid 5 times a month, and my monthly bonus alone was over four figures! I'll never get tired of this life—working from home, spending time with my kids, lounging by the pool, walks along the beach, all while earning more than I ever imagine. Could you use an extra paycheck (or five) each month too? #FinancialFreedom"
2. "What would an extra \$500 to \$2000 do for you? #FinancialFreedom"
3. "I'd seen my mentors 5 figure cheques...I remember messaging my mentor 'if this could bring in an extra \$500 a month that would be incredible for our family - And it did; And it does; Plus much, much more...I went from making zero dollars an hour as a stay at home mom to making multiple four figures every single month for the past one and a half to two years."²
4. "I did not think it was a legit business, I later found out these women were making more monthly than I Make annually. A friend in this business showed me their paycheck of \$100,000 that month and she was not the only one." (October 2024)
5. "Did you know, on average, it's the difference of only \$350, a month, that would keep a US family out of bankruptcy. \$350 a month is what could be all the difference for so many families. For me, when I started MONAT, that was life changing money. That was money that could bring some assurance back to my life. That was money for groceries, a car payment, or utility bills, Maybe you're sitting there thinking, 'Amy, I would love an extra \$350 a month.' I can show you how not only you can make that a month but sooooo much more by working a home based business, part time! Working around the busy schedule you already have, working it in to the nooks and crannies of your life, and give you support to make your goals a reality. I've done it! So many on my team are doing it! You can do this too!" (August 2023)

Company Position

In its submission to DSSRC, MONAT reaffirmed its dedication to ensuring transparency and accuracy in all aspects of its business practices. The Company chose not to substantiate the claims under review but instead undertook corrective measures, including the removal and revision of certain claims.

Preliminarily, MONAT informed DSSRC that of the 18 social media posts that were identified by DSSRC, 12 of the posts were from the Company's Australian Market Partners. To assist DSSRC in tracking its efforts to address the concerns in this inquiry, the Company provided DSSRC with a detailed spreadsheet listing its actions.

Accordingly, MONAT reported the removal of 15 of the 18 posts and described its efforts to reconcile the remaining three posts. One post that remained publicly accessible was disseminated on Instagram by a former salesforce member that had been terminated by MONAT in June 2024. Nevertheless, the Company attempted to contact the individual responsible for the posts and, after it was unsuccessful, contacted Instagram to advise them of the unauthorized claim and request that it be removed. MONAT provided DSSRC with copies of the correspondence it sent to the former salesforce member and Instagram.

The Company was unable to disable two additional posts, which were attributed to a current salesforce member who was reportedly targeted in an imposter scheme. DSSRC received copies of the communications sent to the salesforce member regarding the issue, her response, and documentation showing that the matter had been reported to Facebook.

Administrative Closing Resolution

DSSRC acknowledged and appreciated MONAT's good faith actions to facilitate the removal of 15 of the claims brought to its attention in the inquiry and for working with its Australian partners to address the concerns at issue.

Regarding the identified earnings claims, DSSRC concluded that the social media posts in this inquiry conveyed the impression that a typical MONAT salesforce member could generally anticipate earning substantial income (e.g., "financial freedom"; "\$500 a month," etc.) through participation in the Company's business opportunity.

The Federal Trade Commission (FTC) has consistently maintained that advertisers are responsible for all reasonable interpretations of their advertising claims, not merely the messages they intend to convey. According to the FTC's Policy Statement on Deception (1983), advertisements are assessed through the lens of a reasonable consumer, and advertisers are held accountable for any interpretation that a reasonable consumer might draw from the claim. As a result, advertisers are required to have sufficient substantiation for each reasonable interpretation of its advertising, whether intended or not, in order to comply with Section 5 of the FTC Act.

The FTC's *Business Guidance for Multi-Level Marketing* (the "FTC Guidance") advises that any earnings claim must accurately reflect the income, profit, or financial gain that a typical individual within the targeted audience is likely to achieve. The FTC Guidance also emphasizes that claims suggesting substantial earnings are generally not representative of the average participant's experience. Consequently, promoting atypical earnings claims — such as suggesting that a Company representative will attain financial freedom through the business opportunity — may mislead prospective salesforce members. In this context, if a participant in a multi-level marketing (MLM) or direct selling opportunity makes an income or earnings claim, they must have a reasonable basis for doing so. This standard requires "reliable, empirical evidence" demonstrating that the typical individual in the relevant group is likely to achieve earnings equal to or greater than those suggested by the claim.³

The DSSRC Earnings Claims Guidance for the Direct Selling Industry (the "DSSRC Earnings Claims Guidance") is also particularly instructive regarding terms that are prohibited when made to a general audience of prospective or current salesforce members. For example, section 6 of the DSSRC Earnings Claim Guidance states that "[s]uch 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." 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..."⁴

With respect to the three social media posts that remain publicly accessible, DSSRC determined that MONAT used its best efforts to facilitate removal of the posts by attempting to contact the individuals responsible for the posts and requesting that they be disabled and also contacting the social media company to advise them of the unauthorized posts.

As noted in section (V)(D)(3) of the DSSRC Policies & Procedures, DSSRC has the discretion to administratively close an inquiry when DSSRC determines that the Company has made a bona-fide, good faith effort to have claims that were disseminated by a salesforce member(s) of the Company removed from circulation and that the Company will use its best efforts to ensure that Company salesforce members will refrain from communicating similar claims in the future. DSSRC may request that the Company provide DSSRC with copies of its request(s) to its salesforce member(s) and/or its request(s) to the applicable forum including the social media platform on which such claim was disseminated.

Accordingly, here, MONAT was successful in removing 15 of 18 social media posts identified by DSSRC in the inquiry and demonstrated that it made a good faith effort to have the remaining publicly accessible posts disabled by providing DSSRC with copies of its communication to the individuals responsible for communicating the claims and to the social media platform where the posts were disseminated.

Conclusion

MONAT's successfully removed 15 of the 18 earnings claims brought to its attention in this inquiry and it was concluded that the Company made a genuine, good faith effort to facilitate the removal of the three posts that remain publicly accessible.

In light of the Company's sincere actions to address DSSRC's concerns, this inquiry was administratively closed.

Company Statement

"MONAT Global is committed to upholding the highest standards of compliance, transparency, and truth in advertising across all markets. We maintain a robust compliance program that includes proactive social media monitoring—both internally and through third-party services—and provide clear enforcement protocols to address non-compliant content swiftly and consistently.

Our global compliance team supports Market Partners with comprehensive training, evolving best practices, and tools designed to ensure they are equipped to promote MONAT's brand responsibly and ethically. These efforts are continuously evaluated and enhanced to align with evolving FTC and international standards.

We appreciate DSSRC's collaborative and solutions-focused approach throughout this inquiry. MONAT remains fully committed to leading by example and supporting compliance initiatives that elevate the direct selling channel."

(Case #212, closed on 4/29/25)

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[1] DSSRC identified 4 social media posts that included a "#financial freedom" reference that were disseminated in or about October 2024.

[2] DSSRC identified this same video in two different posts on Facebook Reels.

[3] See FTC Business Guidance Concerning Multi-Level Marketing, Section 13 (April 2024) <https://www.ftc.gov/business-guidance/resources/business-guidance-concerning-multi-level-marketing#deceptive>

[4] DSSRC Guidance on Earnings Claims for the Direct Selling Industry (2022) section6.
[dssrc_guidanceonearningsclaimsforthedirectsellingindustry.pdf](#).

May 15, 2025

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