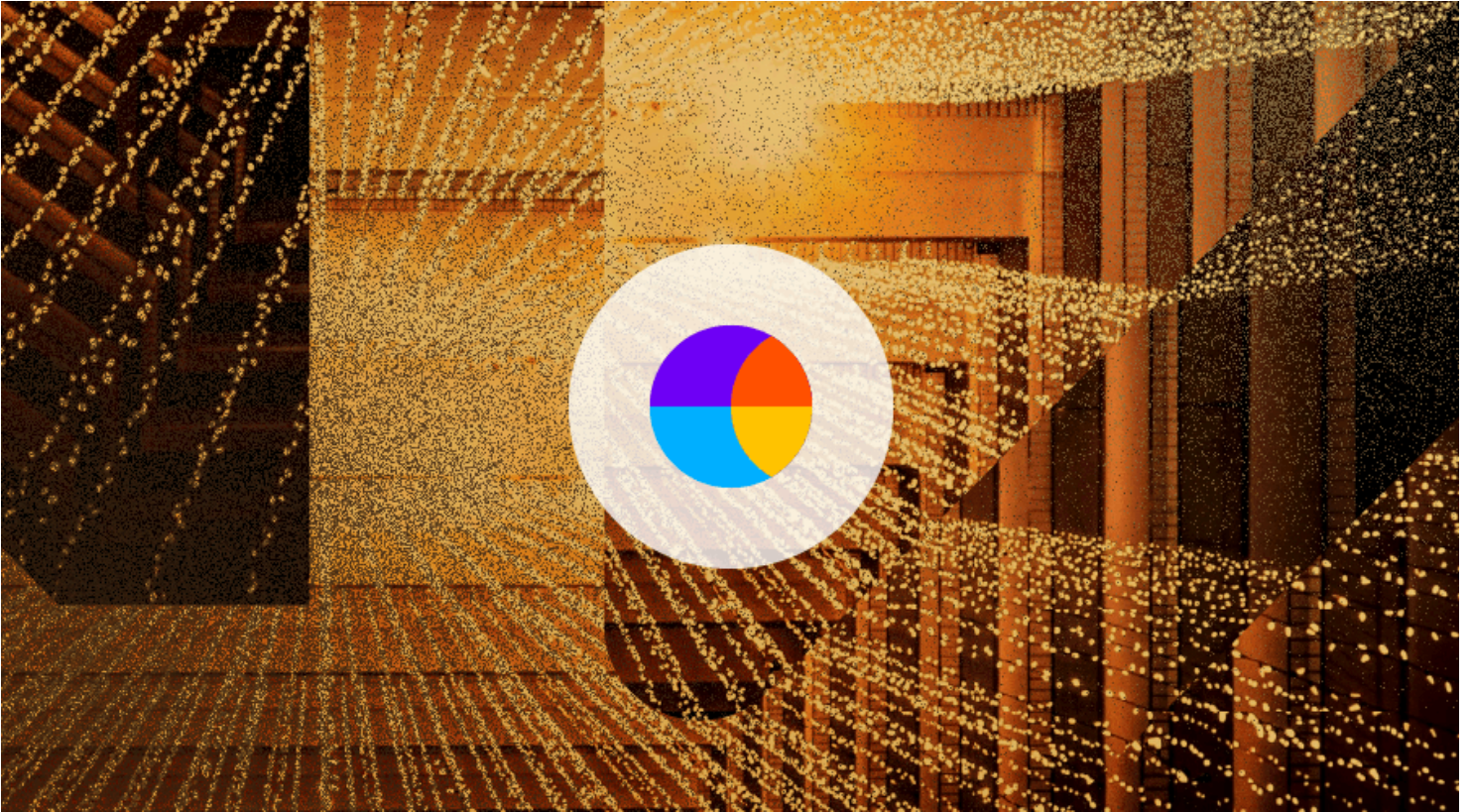


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Case #231-2025: Monitoring Inquiry – Novae LLC

BBB NATIONAL PROGRAMS

Direct Selling Self-Regulatory Council

Case #231-2025: Monitoring Inquiry – Novae LLC

Company Description

Novae LLC (“Novae” or the “Company”) is a direct-selling company based in Conyers, Georgia and founded in 2014. The Company’s mission is to promote financial inclusion by offering access to credit, capital, debt-relief services, business and personal financing.

Basis Of Inquiry







The Direct Selling Self-Regulatory Council (DSSRC) operates as a nationwide advertising self-regulation program for the direct selling industry that is managed by BBB National Programs.

DSSRC initiated this investigation as part of its ongoing, independent efforts to monitor advertising practices within the direct selling channel.

The review focused on income claims made on the Company's website and by members of Novae's salesforce on Facebook. DSSRC was concerned that these claims could lead consumers and potential salesforce members to believe that typical participants in the Company's business opportunity are likely to earn significant income.

The representative claims at issue are detailed below:

Earnings Claims

1. "From just a couple of months it has literally changed my financial situation ... You can't do nothing but win and put you and your family in a better position  This was the best \$349 I have ever invested..."
2. "I'm Louis, a Network Marketer with Novae – Money and Credit, dedicated to helping individuals and families take back control of their finances. Whether you're looking to repair your credit, build financial stability, or earn extra income through a proven system, I provide tools, resources, and real solutions to help you succeed.   . Let's break free from financial stress and build the future you deserve — one smart move at a time.   " AND "GET PAID WEEKLY" (June 2025)¹
3. "#FinancialFreedom" (May 2025)
4. "Join Novae and unlock unlimited revenue potential!... Earn Commissions Immediately"
5. "We have an opportunity for single moms to earn money and make their money work better. We also have services and products that can help with debt and credit. Want to learn how Novae can help? Ask a single mom to check out Novae today and see what works for them to help them break free from debt, add an additional income stream, and/or build a stronger financial future for her and her kids. Remind a single mother, super-heroine today that she is strong, there is help, and she can do this!" AND "#DebtRelief #DebtHelp #FinancialFreedom" (March 2025)
6. "Hey busy career women!  Ever dreamt of achieving financial freedom and reclaiming your time? Join the Novae Affiliate Program and start your journey today! #financialfreedom"
7. "Inhale financial freedom. #millionairemindset #financialfreedom" (March 2022)
8. "If you're ready to start a new financial life with Novae which means new beginnings DM so I can share more information about all the perks that you will be available to you.... Get started as a Novae Money Affiliate Pro for only \$299, normally \$499, and earn over \$2,000 in the next 30 days!!!" (December 2021)
9. "Earn up to \$3,000+ per referral depending on the program your customer enrolls for and potentially grow a residual income." Photo on webpage: "HOW WOULD YOU LIKE TO DRIVE YOUR DREAM CAR ON NOVAE!"

Earnings Claims from Video on Company Website:

10. "Over the first year, I was able to make enough money to quit my job, pay off all my debt. The next year I was making six figures in income, and three years later there were months where I was making six figures per month in income"

Video Testimonials:

- "I was able to save my home from foreclosure, pay for my daughter's education in full and fire my boss"
- "We became affiliates. Six months later, we became homeowners! Now we have a clear vision of our future, new relationships and multiple income streams."
- "After 7 months... I was earning enough to quit my job, improve my credit, and now travel more than I did when I worked at the airline."
- "I started with no experience but after 7 months I was doing my business full time!"
- "You can make up to thousands of dollars with referring people to Novae"
- "Bonuses Are Paid WEEKLY and to UNLIMITED LEVELS!"

Company's Position

Following receipt of DSSRC's Notice of Inquiry, Novae promptly reviewed the 10 online earnings claims in question. After evaluation, the Company concurred with DSSRC's assessment that the claims did not align with Federal Trade Commission (FTC) Guidance and the Company's Policies and Procedures.

In response to the inquiry, Novae immediately attempted to contact the salesforce members responsible for the posts and requested their removal. As a result of the Company's efforts, six of the 10 online representations (including the seven representations from the website video) were successfully removed.

Regarding the social media posts that remain publicly accessible², Novae informed DSSRC that it attempted to contact the salesforce members responsible for dissemination of the claims, however those individuals failed to respond to the Company's Compliance

Department request.

The Company subsequently initiated disciplinary measures, including suspension of the individual's Novae account and consideration of full termination. Novae also shared copies of its outreach efforts with DSSRC and confirmed in writing that it has contacted Facebook to request the removal of the non-compliant content. The Company also placed a statement in the comment sections of the posts identifying the content as unauthorized and advising that the responsible salesforce members had not yet complied with Novae's request to take them down.

With respect to the claims identified by DSSRC that appeared on the Company website and featured video, DSSRC confirmed that the Company removed all of the identified claims that originated from the Novae website, including the testimonials identified in the website video.

Analysis

DSSRC acknowledged Novae's prompt cooperation in responding to this inquiry and confirmed that the Company voluntarily facilitated the removal of six of the 10 online posts identified as part of the review.

Novae also provided written confirmation to DSSRC that it:

- a) attempted to contact the salesforce members responsible for the remaining publicly available posts and initiated the process to suspended or terminate the accounts of those who failed to respond to requests to remove unauthorized claims;
- b) notified Facebook of the unauthorized content; and
- c) when permitted, added comments to the posts to inform the public that the claims were unauthorized and that the Company had requested their removal or significant modification.

DSSRC determined that Novae's good-faith efforts were necessary and appropriate.³

The *FTC Business Guidance for Multi-Level Marketing* ("FTC Guidance") emphasizes that earnings representations must reflect what a *typical* participant can realistically expect to achieve in income, profit, or other financial benefits.⁴ The FTC Guidance cautions that unqualified statements implying substantial or atypical success — such as promises of financial freedom or security — may mislead potential recruits, as such outcomes are not representative of the typical Company salesforce member.⁵ Specifically, disseminating an unqualified or atypical earnings claim (e.g., implying significant income or guaranteed financial stability) risks creating an inaccurate impression for prospective participants. Any individual making an atypical earnings claim must have a reasonable basis, supported by reliable, empirical evidence demonstrating that a typical participant is likely to achieve results comparable to those stated.⁶

Similarly, the DSSRC Guidance on Earnings Claims in the Direct Selling Industry advises companies and salesforce members to avoid language or imagery that exaggerates potential earnings. Terms such as "*financial freedom*" are considered especially problematic if not properly qualified, as they heighten the risk of consumer deception.

In this inquiry, several of the claims at issue appeared on Novae's website. The Company promptly removed statements referring to "*unlimited revenue potential*" and claims that representatives could "*earn up to \$3,000+ per referral*" or "*build residual income.*" Novae also revised its website video to remove six atypical testimonials and deleted the segment in which the spokesperson stated: "*Over the first year, I was able to make enough money to quit my job and pay off all my debt. The next year I was making six figures in income, and three years later there were months where I was making six figures per month in income.*"

As noted in the Basis of Inquiry, DSSRC identified two separate social media posts claiming that the business opportunity could "*help individuals and families take back control of their finances... repair credit, build financial stability, or earn extra income through a proven system... break free from financial stress and build the future you deserve.*" Although Novae successfully removed one post, the Company did not provide information regarding its efforts to address the second, which remains publicly accessible. DSSRC therefore recommends that Novae contact the salesforce member responsible for disseminating the post and similarly request removal of the post that remains accessible by the public.

Conclusion

DSSRC concluded that Novae's actions to remove or modify noncompliant earnings and business opportunity claims were appropriate and responsive to the concerns raised in this inquiry. DSSRC recognized the Company's proactive measures to align its marketing practices with applicable regulatory and self-regulatory standards, including its good-faith efforts to engage salesforce members and coordinate with Facebook to facilitate the removal of unauthorized content. Notwithstanding, DSSRC recommends that Novae make an additional attempt to contact the salesforce member responsible for a remaining post and continue actively monitoring its salesforce communications to promote ongoing compliance and ensure the timely removal of any future unauthorized claims.

Company Statement

“Novae is a strong proponent of industry self-regulation and appreciates the DSSRC's thorough review and recommendations. Novae agrees to adhere to the recommendations outlined in the report. We maintain a robust compliance oversight program, which includes continuous monitoring of our salesforce members' online content and providing regular, comprehensive training on our policies and procedures. As part of our commitment to compliance, we have already taken action to address the materials cited in this report and will continue to enforce our policies to ensure all future sales and earnings claims made by our representatives are truthful, non-misleading, and align with all regulatory guidelines.”

(Case #231-2025. Closed on 10/14/25)

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[1] DSSRC identified this claim in two different social media posts from June 2025.

[2] More specifically, claims #1, 2, 7 & 8 as listed in the above Basis of Inquiry.

[3] DSSRC acknowledges that a direct selling company may not be able to require a former or inactive salesforce members to remove a claim. In that instance, DSSRC nonetheless recommends that the direct selling company make a bona fide good faith effort to have the improper claim removed including a written request to remove improper claims made by salesforce members that have since become inactive.

[4] *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>.

[5] *Id* at Section 13.

[6] *Id*.

November 04, 2025

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