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BBB NATIONAL PROGRAMS

Direct Selling Self-Regulatory Council

Case #260-2026: Administrative Closure – PHP Agency, LLC

Company Description

PHP Agency, LLC (“PHP” or the “Company”) is a direct selling company established in 2009 and based in Addison, Texas. Through its platform, PHP provides training and resources for insurance agents. Additionally, the Company facilitates agent appointments with affiliated insurance carriers, enabling agents to offer life insurance and annuity products to consumers.

Basis of Inquiry

The Direct Selling Self-Regulatory Council (“DSSRC”), a national advertising self-regulation program administered by BBB National Programs, initiated this inquiry as part of its ongoing monitoring of advertising practices within the direct selling industry. The inquiry concerns 11 earnings representations communicated by PHP salesforce members. The representative claims at issue, which appeared on Facebook, YouTube, TikTok, and Instagram, are identified below:

Earnings Claims

1. “Dear Facebook Family, I would appreciate it if you could share this website with anyone who may be interested in term or permanent life insurance at reasonable rates, particularly those with a passion for helping others and seeking six-figure opportunities.” (February 2026)
2. “#FinancialFreedom”¹
3. Image with text overlay stating “\$1,000,000 Ring Earners ...Back in 2019 they broke through barriers crossing \$250k...but they didn’t stop improving.” (November 2024)
4. “Make the leap. Change your career path and open the possibilities of financial freedom. PHP Agency: Coverage for your family. Career for you. #financialfreedom.”
5. (December 2021)
6. “At PHP Agency, Unity is making history—not just building businesses, but building people, creating high earners, and transforming lives every single day through the power of life insurance and financial services. With Unity, it’s not just about making money—it’s about changing lives, protecting families, and creating financial freedom for themselves and others. This group is taking the industry by storm, empowering people to go from feeling stuck in a 9-to-5 to building businesses that offer true independence. At the heart of Unity’s mission is the belief that we rise by lifting others. Through their relentless pursuit of growth, they are creating more high earners, providing financial security, and ensuring legacies for families across the country.” (October 2024)
7. “We’re looking for motivated individuals ready to learn how to build income, impact and freedom part-time or full-time.” (November 2025)
8. “I’m building a powerhouse team of Financial Services Professionals who are ready to change lives by helping families: 💙 Break free & become financially independent 💚 Secure their retirement dreams 💛 Protect loved ones with life insurance 💜 Crush debt once and for all. Work full-time, part-time, or even as a side hustle — your choice. 🙌 Unlimited earning potential. #FinancialFreedom” (December 2025)
9. “... no cap in terms of income that you can make ...vehicle to financial freedom” (December 2024)

Company’s Position

Rather than providing substantiation for the claims identified in the inquiry, PHP elected to discontinue the challenged representations. The Company reviewed the social media content at issue and requested removal of the identified posts. PHP subsequently informed DSSRC that all claims subject to the inquiry had been removed.

PHP informed DSSRC that it maintains compliance measures designed to guide appropriate social media activity by its salesforce members. According to the Company, its Associate Agreement includes provisions addressing social media compliance obligations and expectations applicable to participating agents. PHP also utilizes a Social Media Compliance Certification program for agents, intended to reinforce the Company’s advertising and marketing standards. In addition, the Company indicated that it conducts field leadership and compliance training sessions that provide ongoing guidance regarding advertising practices, including earnings and social media claim requirements.

The Company noted that it also works with a third-party monitoring company to review and correct, if necessary, any social media posts.

Administratively Closed Resolution

DSSRC acknowledged the actions taken by PHP to remove the 11 claims identified in the inquiry and determined that the Company’s responsive measures to facilitate the removal of the claims were appropriate under the circumstances.

DSSRC concluded that the claims at issue, which included representations referencing a “full-time” income opportunity, “no cap in terms of income,” becoming “financially independent” and attaining “financial freedom,” reasonably conveyed the message that participants in the PHP business opportunity could generally expect to achieve substantial earnings or financial success.

The FTC Business Guidance for Multi-Level Marketing explains that representations suggesting substantial (or extraordinary) earnings generally do not reflect the results typically achieved by most participants in a direct selling or MLM program. As such, claims conveying significant income potential may mislead consumers if they are not representative of generally expected results. Accordingly, when

disseminating earnings or lifestyle claims, companies and their salesforce members must possess a reasonable basis for such representations, including reliable evidence demonstrating that the typical participant is likely to achieve results consistent with the message conveyed by the claim.”²

The DSSRC Guidance on Earnings Claims for the Direct Selling Industry (“DSSRC Earnings Claim Guidance”) likewise advises direct selling companies and their salesforce members to avoid representations that convey a level of income or lifestyle success that is not generally representative of the typical participant experience. The DSSRC Earnings Claim Guidance further notes that certain terms and phrases may present an increased risk of misleading consumers when used broadly in marketing materials, including references such as “financial freedom,” which may imply the likelihood of substantial or exceptional earnings.³

Conclusion

In light of PHP’s actions to remove the 11 social media posts brought to its attention in the inquiry, DSSRC determined that administrative closure of the inquiry was appropriate.

Company Statement

“PHP Agency, LLC appreciates the opportunity to work collaboratively with BBB DSSRC in connection with this inquiry. We are firmly committed to ensuring that representations regarding our business opportunity are accurate, transparent, and compliant with applicable standards. Maintaining a reputation for integrity with consumers, regulators, and industry peers is of paramount importance to us.

To that end, PHP is dedicated to continuously strengthening its compliance program, including proactively identifying opportunities to enhance training, monitoring, and oversight. We provide our independent sales force with clear guidance and practical tools to support responsible and substantiated marketing practices. Equally important, we hold our sales force accountable for their marketing activities, including social media posts, and take appropriate corrective action when content does not meet our compliance standards.”

(Case #260 closed on 5/20/26)

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[1] This claim was identified by DSSRC in two Facebook posts, as well as in content published on TikTok and Instagram.

[2] *Id.*

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

July 01, 2026

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