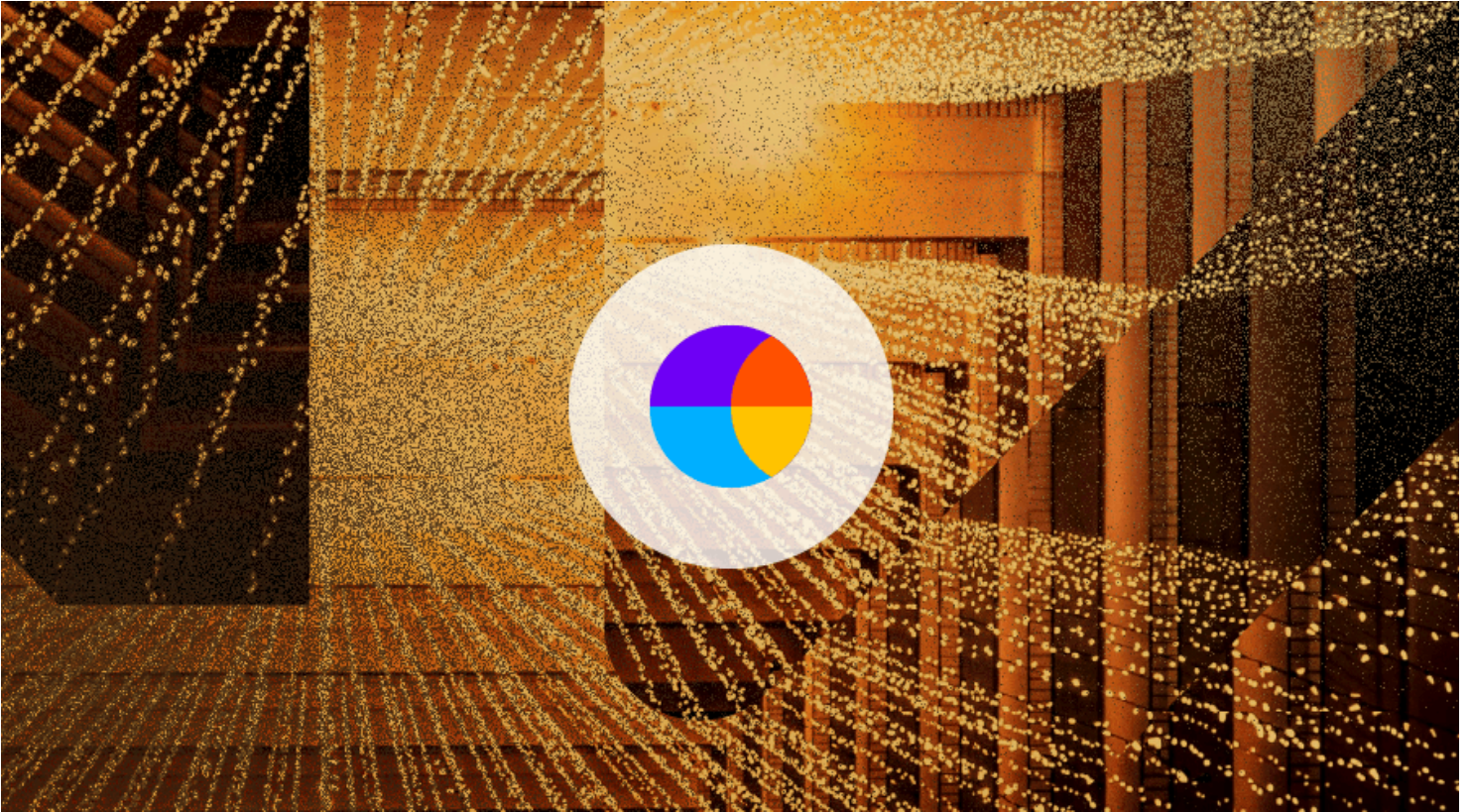


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# Case #229-2025: Administrative Closure - Paparazzi Accessories, LLC

## BBB NATIONAL PROGRAMS

Direct Selling Self-Regulatory Council

Case #229-2025: Administrative Closure - Paparazzi Accessories, LLC

## Company Description

Paparazzi Accessories, LLC (“Paparazzi” or the “Company”) is a direct selling company headquartered in St. George, Utah and founded in 2011. The Company markets fashion accessories, primarily focused on jewelry and related items.

## 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 in the direct selling marketplace and pertains to income claims disseminated by Company salesforce members.

The representative claims set forth below that formed the basis of this inquiry were all disseminated on Facebook.

### *Earnings Claims*

1. “Unlimited earning potential” (March 2025)
2. “Can you use an extra \$500 or more per month.... Listen to how this former six-figure Executive in the financial industry joined Paparazzi for a tax break. Then after one year in the business she decided to do it full-time” (March 2025)
3. “Have a part time business with full time pay” (July 2019)
4. “we create a lifestyle of elegance, empowerment, and financial freedom” AND “Set your own schedule, build your brand, and enjoy financial independence.” AND “Work on something you love while making a meaningful income.” (November 2024)
5. “Whether you’re looking to shine with \$5 accessories or dreaming of financial freedom, Paparazzi Accessories has something for everyone.” (November 2024)
6. “Earn unlimited income selling fabulous \$5 jewelry” and “Develop confidence, leadership skills, and financial freedom” (December 2024)
7. “Incredible money-making potential 🏡” AND “Let’s start your journey to financial freedom and fun today” (November 2024)
8. “Unlimited Earning Potential.” AND “whether for travel, tax write off, sisterhood/brotherhood, financial freedom, becoming your own boss.” (September 2024)
9. “I earned a FREE trip provided by Paparazzi Accessories! What's included??? ✈️ RT Flight ✈️ FREE; 💎 A stay at the 5★ Venetian hotel in a luxurious suite with no roommates! – FREE; 💎 \$2,000 shopping spree in Vegas- FREE” AND “Income Disclosure in the comments” (Income Disclosure could not be found) (September 2023)
10. “I joined Paparazzi Accessories to always be able to have an extra source of income and because i love jewelry 💎 To have financial freedom.” (August 2023)
11. “Congratulations to Paparazzi Accessories newest six figure earners (\$100,000) in team building commission! They all did this in 8 months.” (September 2023)
12. “MY FOURTH 6 FIGURE BLING BOSS TROPHY FROM PAPARAZZI ACCESSORIES! I earned my 2021 - 6 FIGURE BLING BOSS TROPHY BASED ON MY JANUARY 2021 COMMISSION.” (March 2021)

### **Company’s Position**

After receiving the Notice of Inquiry, Paparazzi promptly reviewed all of the claims from the social media posts identified by DSSRC. Following this review, the Company removed 10 Facebook posts in their entirety and revised two additional social media posts to address the claims in question and resolve DSSRC’s concerns.

Paparazzi reiterated its commitment to DSSRC’s mission of protecting consumers from misleading or unsubstantiated income representations. The Company emphasized that it regularly educates its independent salesforce on compliance requirements, incorporates strict compliance provisions in its Policies & Procedures and enforces those standards consistently. As part of these efforts, Paparazzi engages an independent third-party service with particular expertise in the direct selling channel to monitor social media and other online content related to the Company. While noting that its process for assessing alerts from this monitoring service continues to evolve, Paparazzi stated that it takes prompt action and conducts follow-up to address any violations of its compliance policies.

To further demonstrate its efforts, the Company provided DSSRC with a copy of its published Earnings Claim Guidance distributed to salesforce members, along with links to DSSRC’s own Guidance on Earnings Claims and the Federal Trade Commission’s (FTC) recent publication on the subject.

### **Administratively Resolved Resolution**

DSSRC acknowledged Paparazzi’s prompt attention and concerted actions in addressing the 12 social media posts identified in this inquiry. Rather than attempting to substantiate the earnings claims, the Company voluntarily contacted the salesforce members who disseminated the posts and requested that they be removed or significantly modified. This effort led to the removal or revision of all claims identified by DSSRC, which it determined to be both appropriate and necessary.

In its initial review, DSSRC found that the earnings representations at issue created the impression that a typical Paparazzi salesforce member could expect to earn substantial or career-level income (e.g., “unlimited earning potential,” “full-time pay,” “six figures,” and

“financial freedom”) through participation in the Company’s business opportunity. However, the FTC’s Business Guidance for Multi-Level Marketing makes clear that any income representation must reflect what the average participant is likely to achieve.<sup>1</sup> The FTC has emphasized that references to unlimited or career-level earnings are not typical of most direct selling participants and, DSSRC agreed that without reliable substantiation, such claims can mislead consumers. Accordingly, the FTC requires that any income or lifestyle representations be supported by credible, empirical evidence demonstrating that the typical participant is likely to earn the amounts claimed.

Thus, DSSRC agreed that disseminating unqualified, atypical earnings claims may create a deceptive impression about the business opportunity. In this regard, if a participant in a multi-level marketing endeavor or direct selling opportunity communicates an income claim, they must have a reasonable basis for making the claim. This includes “reliable, empirical evidence demonstrating that the typical person in the group . . . is likely to realize . . . an amount equal to or greater than that conveyed by the earnings or lifestyle claim.”<sup>2</sup>

The DSSRC Guidance on Earnings Claims for the Direct Selling Industry provides similar direction. It cautions companies and salesforce members against using language or imagery that suggests income levels beyond what the average participant can reasonably expect. The DSSRC Guidance also highlights certain terms as particularly high risk for misleading consumers, including “unlimited income” and “financial freedom.”<sup>3</sup>

In prior inquiries, DSSRC has determined that aspirational income claims—such as references to “financial freedom”—when used without clear qualification, create ambiguity for consumers and prospective salesforce members. Without appropriate context, it is reasonable for individuals to interpret the phrase “financial freedom” literally, as suggesting that participation in the direct selling opportunity will eliminate financial concerns or provide a substantial, life-changing level of income.

In response to this inquiry, Paparazzi took corrective action by reaching out to the Company salesforce members responsible for the identified claims. As a result, Paparazzi successfully facilitated the removal of 10 social media posts and assisted in the significant revision of the two remaining social media posts to eliminate references to “financial freedom.”

Accordingly, DSSRC administratively closed its inquiry based upon the Company’s efforts to remove or significantly modify all of the social media posts at issue..

## Conclusion

In light of Paparazzi’s good-faith efforts to remove or revise the 12 claims identified, DSSRC determined that administrative closure of the inquiry was appropriate.

(Case #229, closed on 9/08/25)  
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[1] 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>.

[2] *Id.*

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

September 23, 2025

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