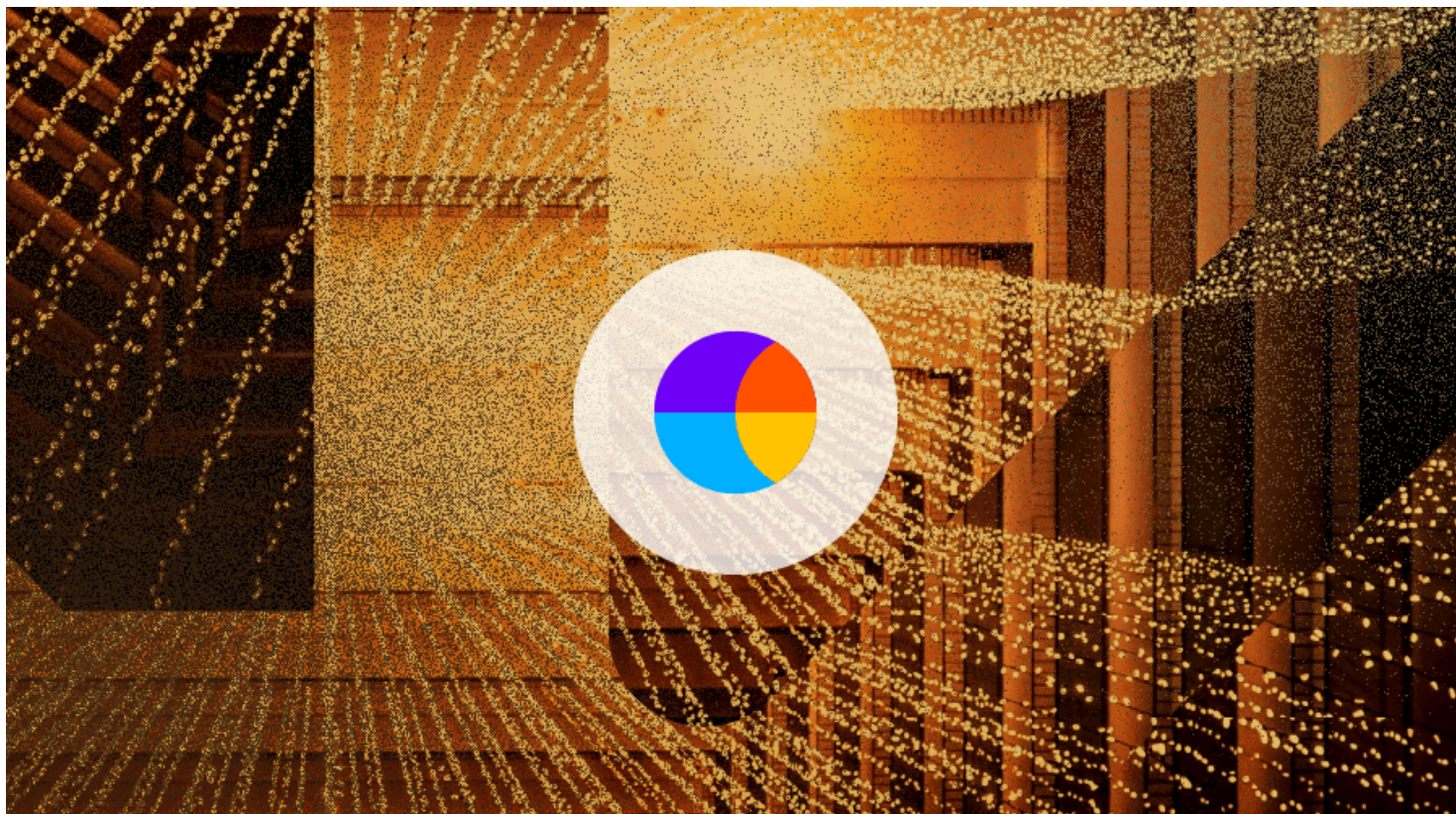


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1. [Home](#)
2. [Programs](#)
3. [Advertising Self-Regulation](#)
4. [Direct Selling Self-Regulatory Council \(DSSRC\)](#)
5. [Case Decisions](#)
6. [Case #237-2025: Rain International, LLC](#)

Case #237-2025: Government Referral – Rain International, LLC

BBB NATIONAL PROGRAMS

Direct Selling Self-Regulatory Council

Case #237-2025: Government Referral – Rain International, LLC

Company Description

Rain International, LLC (“Rain International” or the “Company”) is a direct selling organization established in 2011 and headquartered in American Fork, Utah. The Company offers a line of seed-based nutritional and wellness products—including supplements, powders, beverages, and snack bars—centered around its “nutrition from seeds” concept, utilizing ingredients such as black cumin seed and grape seed.

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 as part of its continuing independent review of advertising and marketing claims within the direct selling industry.

The representative earnings claims that formed the basis of this inquiry were disseminated on social media platforms including Facebook, Instagram, and LinkedIn. The inquiry also included three “financial freedom” claims that were published on the Company’s website.

1. Did you hear the good news? Our Rain Reimagined Promotion has been extended. Now, you have an extra chance to earn big bonuses on the RPs you enroll. (February 2021)
2. “...being part of rain means you unearth your greatness, spread the power of seed nutrition, gain financial freedom, and prioritize YOU. this year we’re going harder. ready for us?” (January 2025)
3. “This one giving me leverage as in time and money. Every year company will give me...exotic places that I would not spend my own money to come fully. For instance, Costa Rica. They taking care of whatever your household that you need, whatever tuition fee, college fee that you need. And on top of that we have a free holiday”
 1. Description under video: “we strive for each member of rain international to experience the joys of financial freedom... we love Julia’s journey as a single mother who enjoys her free holidays too✈️”¹
4. “We’re unified family that champions health, provides opportunity, and offers personal, financial freedom.”²
5. “Only one of the feet received the toes amputated. Rain has stopped the amputation in the second foot.... I’m also sharing it with my son.. has had a ruptured aorta, he is feeling much better also.... We will do this for the next year. So twelve months, because the outcome is at the end of the next 12 months these people will have a minimum of \$1,500 in passive income...now the truth is most people will earn far more than that. But if you just do what we teach you that’s where you’ll be in a year, or more...Let me say it different, in the next 12 months you will at least be at \$1,500 in passive income or more.”
6. “We’re unified family that champions health, provides opportunity, and offers personal, financial freedom. See how Rain can change your life, below.” (January 2021)
7. “We believe changing the world begins with each individual. Our mission is to advance the health of every person with seed-nutrition so we can create true prosperity; through health, charity, personal growth, and financial freedom.”

DSSRC was concerned that the representative claims identified on social media and on the Company’s website may mislead a reasonable consumer to believe that a typical Rain International salesforce member can expect to earn substantial income, receive significant bonuses and travel incentives, and achieve financial freedom.

Company’s Non-Participation in the DSSRC Process

On July 21, 2025, DSSRC issued a Notice of Inquiry to Rain International via email and USPS two-day mail, sent to the Company’s headquarters in Utah and requested that the Company provide a response on or before August 21, 2025.

When the Company did not respond within the initial 15-business-day period, DSSRC made additional attempts to contact Rain International and, on September 2, 2025, issued a 10-Day Notice via email and USPS two-day mail. The Notice advised that, absent a response within 10 business days, the matter would be referred to the appropriate government agency.

Shortly thereafter, Rain International contacted DSSRC by telephone to request an extension until September 26, 2025 to provide a substantive reply to the inquiry, which DSSRC granted. However, the Company again failed to provide a response by the extended deadline. DSSRC then made further unsuccessful efforts to re-engage with the Company. Consequently, on October 13, 2025, DSSRC sent a second 10-Day Notice via email and USPS two-day mail, advising that the matter would be referred to the appropriate government agency if a response was not received by October 29, 2025.

Despite multiple opportunities to respond, Rain International did not submit a response to the DSSRC inquiry, and the earnings claims identified in this matter remain publicly accessible in their original form.

Referral to the Government

DSSRC determined that the subject claims being disseminated by Rain International salesforce members on social media and on the Company website expressly and inaccurately claimed that Company salesforce members can earn significant income, achieve financial freedom, and earn free trips. All of the identified posts remain accessible to the public.

As stated in section 13 of the Federal Trade Commission’s (FTC) 2024 Business Guidance concerning Multi-Level Marketing, 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. This is true wherever the representations are made, including on social media, in live presentations, in one-on-one conversations, or in any other medium.³ It is further noted in the FTC Business Guidance that

even truthful testimonials from MLM participants who earn large amounts of money or career-level income likely will be interpreted as representing that their experience is representative of what others should expect to receive. Given the reality of MLM participant experiences, such a testimonial is atypical and not representative of what most MLM participants will achieve. Presenting atypical earnings information to consumers considering an income opportunity is likely to generate a deceptive impression.

In addition, Section 6 of the *DSSRC Guidance on Earnings Claims for the Direct Selling Industry* (“DSSRC Earnings Claim Guidance”) provides that, although DSSRC evaluates each claim in light of its overall context and the net impression it conveys to the intended audience, certain words and phrases are strictly prohibited when communicated to a general audience of prospective or current salesforce members. Prohibited expressions include, but are not limited to, statements such as “quit your job,” “be set for life,” “make more money than you ever imagined,” “unlimited income,” “full-time income,” “replacement income,” “career-level income,” or other substantially similar representations. Additionally, terms such as “passive income” and “residual income” are not permitted when used in a manner that suggests that salesforce members can earn ongoing income with little or no continuing effort.⁴

The *DSSRC Guidance on Earnings Claims* further states that certain words and phrases present a heightened risk of misleading consumers when used in a general context. Among these high-risk expressions is the term “financial freedom,” which may create unrealistic expectations regarding potential earnings or lifestyle outcomes.⁵

Pursuant to Section V(C)(4) of the *DSSRC Policies and Procedures*, if a company that is the subject of a DSSRC inquiry fails to participate in the self-regulatory process, DSSRC shall refer the matter to the appropriate government agency for further review and potential law enforcement action.

Accordingly, due to Rain International’s failure to respond to the self-regulatory inquiry or address the concerns raised by DSSRC, this matter has been referred to the Federal Trade Commission and the Office of the Utah Attorney General for further review.

(Case #237, closed on 11/2/25)
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[1] This claim was identified by DSSRC in two separate Facebook and Instagram posts.

[2] The claim that Rain International offers business opportunity participants financial freedom was communicated on three different pages on the Company website.

[3] See <https://www.ftc.gov/business-guidance/resources/business-guidance-concerning-multi-level-marketing#deceptive>

[4] See section 6 of the DSSRC Earnings claim Guidance for the Direct Selling Industry.

[5] *Id.*

November 24, 2025

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