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# Case #242-2025: Administrative Closure – The Super Patch Co.

## BBB NATIONAL PROGRAMS

Direct Selling Self-Regulatory Council

Case #242-2025: Administrative Closure - The Super Patch Co.

## Company Description

The Super Patch Co. (“Super Patch” or the “Company”) is a direct selling company headquartered in Ontario, Canada, founded in 2023. The Company markets “Super Patches,” adhesive patches that utilize a proprietary technology to stimulate the skin’s neural response for various wellness benefits. Super Patch distributes its products through a digital sales system supplemented by independent salesforce members.

## 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 disseminated on Facebook and YouTube.

### *Earnings Claims*

1. “In these times of escalating costs of everything... Whether it’s 200. or 500. or more that you would like to add to your household income, I can help.” (May 2024)
2. “How to create Financial Freedom... #FinacialFreedom”
3. “Financial freedom is all about control, and as an entrepreneur, you're the maestro of your financial orchestra. Scaling up your business, exploring innovative ventures, and dominating new markets – that's where the magic happens. Entrepreneurship isn't a job; it's a wealth-building journey that empowers you to call the shots and determine your financial destiny. Start today!” (April 2024)
4. “Start Your Journey to Financial Freedom with SuperPatch and join our community today! Here’s why SuperPatch and the direct sales model are game-changers: Unlimited Earning Potential: In direct sales, your income isn’t capped. The harder you work, the more you can earn. It's a real opportunity to pay off debt, save for your future, or provide for your family’s dreams. #FinancialFreedom #GetOutOfDebt” (January 2025)
5. “In 7 months with Super Patch I am making more \$ monthly than any monthly money I’ve made over the last 5 years in another company with this business structureI need help getting to all the people with mental, physical, and financial needs!” (February 2025)
6. “If you’ve been searching for something different—something that aligns with your desire for impact, innovation, and financial freedom—look no further than the Super Patch Company.” (January 2025)
7. “financial freedom” (January 2025)
8. “financial freedom #FinacialFreedom” (July 2025)
9. YouTube video titled “Achieving Financial Freedom: Steve Schulz’s Journey in Network Marketing and His ‘Yes’ Philosophy” - “Steve's journey began as a full-time school teacher who found himself limited financially. However, after devoting 3-5 hours per week to his business, Steve's dedication paid off. His wife, Colleen, eventually left her teaching position, and soon after, Steve followed suit... #FinancialFreedom” (May 2023)
10. “From food lines to financial freedom. A tiny product and a crazy dream. I was skeptical. But I was also desperate. So I said yes. That yes saved our home. That yes put food on the table. That yes led to private jets, world travel and mentoring 100+ women into millionaires. Sometimes your entire life changes with one brave yes.” (August 2025)

### **Company’s Position**

Upon receipt of the Notice of Inquiry, Super Patch promptly conducted a review of all ten claims that were identified by DSSRC. In line with the Company’s internal compliance procedures, Super Patch immediately reached out to the individuals responsible for the posts to explain the nature of the non-compliance and to request that the content be removed or appropriately modified.

As a result of its good faith efforts, the Company successfully removed nine social media posts.

Regarding the post highlighted by DSSRC that included claims such as “from food lines to financial freedom” and references to “private jets, world travel, and mentoring 100+ women into millionaires,” Super Patch reported that it investigated the matter and verified the individual’s status. After completing its review, the Company confirmed that the person who made the post is not listed in its system and has never been associated with Super Patch in any capacity, including as an independent distributor.

In addition to Super Patch’s corrective actions, the Company expressed a commitment to continue to reinforce a comprehensive compliance framework designed to educate, monitor, and support its salesforce regarding income claim requirements. The Company (a) renewed its training efforts for its compliance department regarding earning claims, (b) reviewed its training material for its distributors on what constitutes non-compliant posts, and (c) contacted a third-party vendor to provide social media and internet monitoring and compliance assistance.

Super Patch emphasized its dedication to maintaining high standards of transparency and integrity in the marketplace.

### **Administratively Resolved Resolution**

DSSRC acknowledged Super Patch’s actions in addressing the earnings claims at issue and concluded that the Company’s responsive actions were both necessary and appropriate.

In its review, DSSRC expressed its concern that the earnings claims conveyed the impression that a typical Super Patch salesforce member would earn substantial income (e.g., replacement income, “financial security,” or “financial freedom”) through participation in the Company’s business opportunity.

The FTC’s Business Guidance for Multi-Level Marketing (“FTC Guidance”) makes clear that any earnings representation must reflect what the average participant is likely to achieve. According to the FTC Guidance, references to unlimited income potential or career-level earnings are not typical of the experiences of most participants, and therefore such claims can mislead consumers. The FTC Guidance further emphasizes that income or lifestyle claims must be supported by reliable, empirical evidence showing that the typical participant is likely to earn the amount represented.<sup>1</sup> Thus, disseminating atypical earnings claims may create a deceptive impression about the business opportunity. In this regard, if a participant in an MLM or direct selling opportunity makes an income or earning claim they must have a reasonable basis for making such claims. 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.<sup>4</sup>

Lastly, regarding the post that included references to “financial freedom,” “private jets,” “world travel,” and mentoring “100+ women into millionaires,” DSSRC’s independent review confirmed that the individual who disseminated the post has no record of association within the Company’s systems and has never been affiliated with Super Patch. In light of these findings, DSSRC concluded that the Company was under no obligation to substantiate the earnings representation made by the unaffiliated individual.

In summary, Super Patch took corrective action by contacting the salesforce members responsible for the claims within its control and by implementing additional compliance measures across its salesforce. As a result of these efforts, the Company successfully removed all nine social media posts disseminated by its salesforce members, and the remaining post was found to have been disseminated by an individual with no current or past affiliation with Super Patch.

## Conclusion

In light of Super Patch’s good-faith actions to facilitate the removal of the nine claims within its control, and given that the remaining post was disseminated by an individual with no affiliation to the Company, DSSRC determined that no further action was necessary and administratively closed the inquiry.

## Company Statement

“Super Patch is fully committed to truthfulness and transparency when promoting business opportunities. We take pride in and strive to maintain our favorable reputation with consumers and industry peers. We will continue to identify and act on opportunities to provide further or better compliance training and tools to our Associates.”

(Case #242, Closed on 12/09/25)

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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\\_guidanceonearningsclaimsforthe directsellingindustry.pdf](https://dssrc.org/earningsclaimsforthe directsellingindustry.pdf).

[4] See DSSRC Case #220-2025: Monitoring Inquiry – Thrive Life, LLC; DSSRC Case #229-2025: Monitoring Inquiry - Paparazzi Accessories, LLC.

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