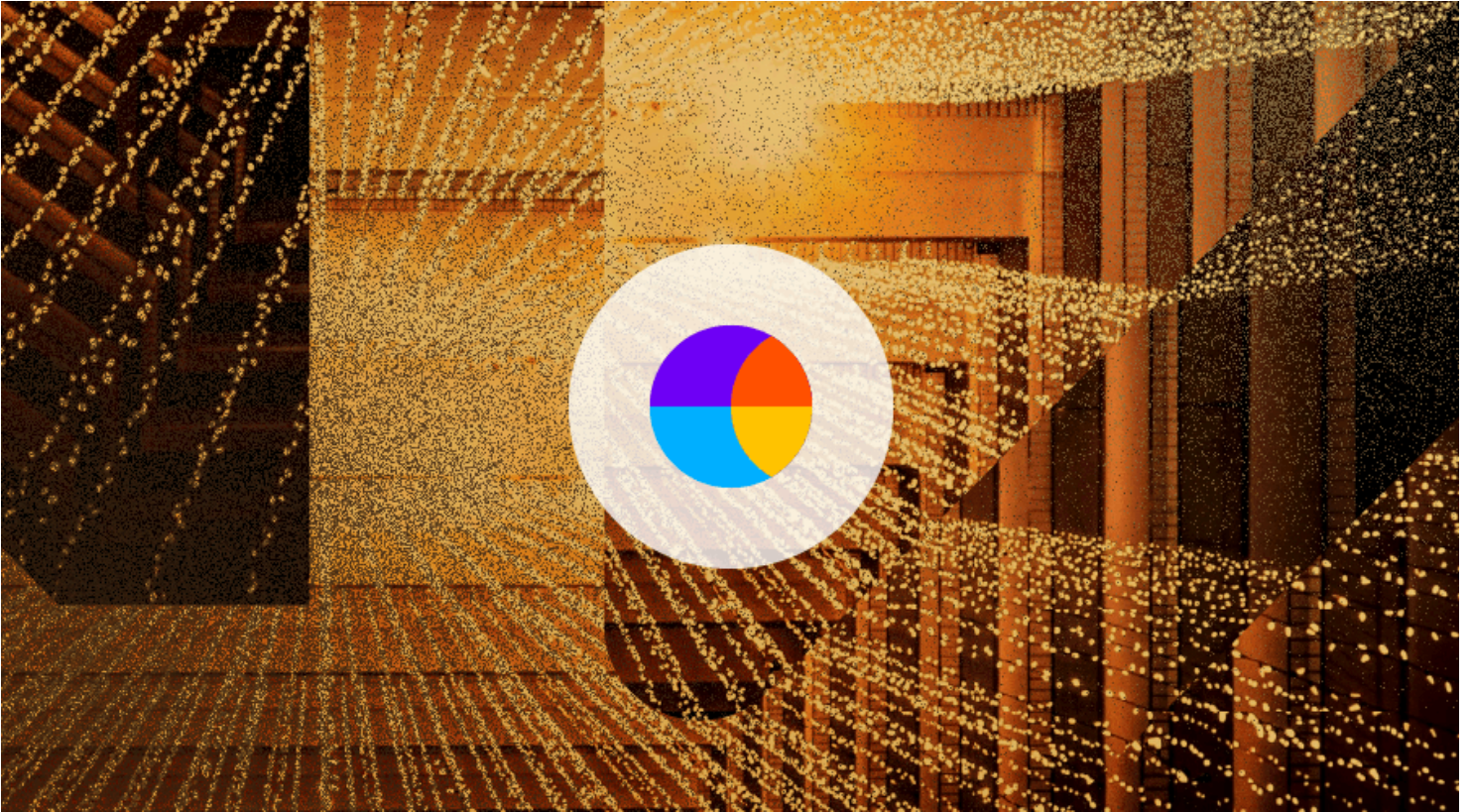


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Case #240-2025: Administrative Closure – Terramar USA, LLC

BBB NATIONAL PROGRAMS

Direct Selling Self-Regulatory Council

Case #240-2025: Administrative Closure - Terramar USA, LLC

Company Description

Terramar USA, LLC (“Terramar” or the “Company”) is a direct selling company headquartered in Norfolk, VA, that was founded in 2020. The Company markets beauty and personal care products (skin care, hair care, bath and body, fragrances).

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 Instagram.

Earnings Claims:

1. "Join Terramar Brands USA to have financial freedom. Minimum investment. Earnings up to 600%. Discounts on your products. Bonuses. Free travels all inclusive." (September 2022)
2. "Dear friend, I have embarked on a path of growth, empowerment, and transformation with Terramar Brands, a community that believes in the value of beauty, financial freedom, and the power of women supporting other women. Today I want to invite you to join my lineage—not only as part of my team, but as part of a dream built among friends who believe in their potential. Here, together we can grow, undertake, and achieve new goals. Do you dare to discover what we can achieve together? I am here to walk with you, step by step, on this new adventure." (May 2025)
3. "Looking for a Real Business Opportunity in Direct Sales? Terramar Brands is the chance you've been waiting for! No memberships. No subscriptions. No limits. Start building your own success story — with a proven business model and powerful rewards! Get a 50% Earned Discount Privilege + up to an additional 35% Receive a \$50 Team Building Bonus for each new partner Earn jewelry Earn a FREE car Qualify for national and international trips Hit milestones and earn cash bonuses: \$500 | \$1,500 | \$5,000 | \$50,000 | \$100,000+ Whether you want extra income or a full-time lifestyle, this opportunity is designed to grow with you... #MLMOpportunity #EarnMore #WorkFromAnywhere #CashBonuses #FreeCar" (June 2025)
4. "Why do I love Terramar ?? Will you look at this ... Mother's Day .. look no further .. Are you looking for a change ? Want to make extra money ? Want to make a career? Do you like to help others ? No parabens or sulfates ! Amazing products.." (May 2025)
5. "Then I began to build a team. I'm excited to say that last month I became a Star in my leader Tania Castillos team. This means I got 9 active ladies on my team. So I'm getting a \$250 bonus plus 12% of our sales. The month before I got a \$100 bonus. Today Tania had a group meeting and we were all entered for an opportunity to win a prize. I won the grand prize. I claimed it!!!!" (February 2023)
6. "LOOKING FOR A JOB? 🇺🇸 Increase your income with TERRAMAR BRANDS USA 🇺🇸 Business opportunity specially for you ✨ ENTERPRISING WOMAN ✨ That you want to get: 💙 Star your own business 💙 Rewards and bonuses 💙 Flexible working hours 💙 Unlimited extra income 💙 Retirement plan 💙 Your own car 💙 Monthly check" (October 2022)
7. "Do you want to generate income without neglecting your children? 🤔 It's not enough for you with what you earn??? do you like sales??? 🇺🇸 🇺🇸 🇺🇸 Terramar brands offers you 100% profit free home delivery monthly gift and opportunity to generate a monthly check" (December 2023)
8. [02:15] Participate in the Terramar drive into success program and Terramar driving to success premium car; have access to the retirement program; inherit your business, earn bonuses up to \$100,000; attend dinners and gala event...travel through the world with the award trips [03:00] Our leader's stories show that Terramar transformed their lives by multiplying their income within only three months after joining the career program." (December 2022)
9. "Do you want to start 2025 building your own empire , achieving your financial freedom and enjoying unparalleled profits? ✨ Unique opportunity: save money on your personal consumption 💰 or start your business to generate significant income 📈 . ✨ Exceptional retirement plan: build your business and secure an incredible future that no other company offers you 🏆 ." (January 2025)
10. "Are you ready to shatter the limitations of living paycheck to paycheck and create a life of financial freedom?"
11. "Welcome to our work team and thank you for the trust, congratulations on making the decision to start your own business with unlimited income!!!" (July 2024)
12. "Also this month the bonuses and gifts for new income add up to more than \$615 USD"(February 2023)

Company's Position

Shortly after being contacted by DSSRC, Terramar immediately conducted a thorough review of the 12 social media posts identified in the inquiry. In accordance with its internal compliance procedures, the Company promptly reached out to the individuals responsible for the cited social media posts to explain the nature of the violations and to request that the content be removed or appropriately corrected.

Following these efforts, Terramar informed DSSRC that all but two of the posts had been taken down. With respect to the two remaining publicly available posts, the Company explained that the first post originated from a fake account that has shown no activity since August 2024. Despite repeated attempts, Terramar was unable to contact the individual associated with the account. The Company then reported the unauthorized post to Instagram and provided DSSRC with screenshots documenting the report.

Regarding the second remaining post, Terramar clarified that it was disseminated by an individual who is no longer affiliated with the Company and has not published any content since February 2023. Terramar confirmed in writing that it made several unsuccessful attempts to reach this person and subsequently reported the post to Facebook, also submitting screenshots of its outreach to DSSRC.

Terramar explained to DSSRC that it maintains clear policies and procedures prohibiting unauthorized earnings claims. While acknowledging that some of its salesforce members' posts did not meet these standards, the Company emphasized that it responded

promptly and in good faith to correct the issue.

To reinforce its compliance framework, Terramar also implemented enhanced training focused on the communication of appropriate income claims and issued reminder notices to its active salesforce members.

Administratively Closed Resolution

In response to this inquiry, Terramar immediately reached out to the salesforce members responsible for the identified claims and, as a result, was successful in removing 10 of the 12 social media posts brought to its attention by DSSRC.

DSSRC acknowledged Terramar's good faith actions in addressing the two posts that remain accessible to the public while concluding that the Company's responsive actions were both necessary and appropriate.

Earnings Claims

In its review, DSSRC determined that the earnings representations identified in this inquiry could reasonably create the impression that a typical Terramar salesforce member is likely to achieve substantial levels of income (e.g., "financial freedom") through the Company's business opportunity.

According to the Federal Trade Commission's Business Guidance for Multi-Level Marketing (FTC Guidance), any earnings representation must accurately reflect what the typical business opportunity participant can generally expect to earn. The FTC cautions that claims referencing career-level income or large amounts of money that can be earned are generally not representative of the income that can be expected by the typical salesforce members and therefore may mislead consumers.¹ The Guidance further underscores that any atypical income or lifestyle claims must be supported by reliable, empirical evidence demonstrating that the typical participant is likely to achieve the represented results. Absent such substantiation, disseminating extraordinary or aspirational income claims may create a deceptive impression about the opportunity.²

Similarly, DSSRC's Guidance on Earnings Claims in the Direct Selling Industry states that companies and their salesforce members should avoid language or imagery implying income levels that exceed what an average participant could reasonably expect to earn. DSSRC has specifically identified the phrase "financial freedom" as high-risk for consumer misinterpretation.³ In previous inquiries, DSSRC has concluded that aspirational terms—when presented without clarification or qualifying context—can reasonably be interpreted as promises of significant or transformative income. Without context, consumers may take "financial freedom" literally, inferring that participation in the direct selling program could eliminate financial hardship or produce life-changing wealth.⁴

With respect to the two posts that Terramar was unable to have removed, DSSRC recognizes that a direct selling company often cannot compel former salesforce members or individuals unaffiliated with the company to take down noncompliant content. In such cases, DSSRC recommends that companies make a bona fide, good-faith effort to effectuate removal—such as by sending written requests to the individuals involved—and, where available, by using the social media platform's reporting mechanisms for trademark or content violations.

In this instance, Terramar provided DSSRC with written documentation confirming its efforts to contact the individuals responsible for the posts, along with evidence that the Company reported the unauthorized posts to the respective social media platforms through the appropriate reporting channels.

Given the Company's actions demonstrating a genuine effort to address DSSRC's concerns, DSSRC administratively closed its inquiry.

Conclusion

DSSRC administratively closed its inquiry based upon the Company's removal of 10 of the 12 social media posts at issue in the inquiry as well as its good faith efforts to reconcile the two remaining posts.

Company Statement

"Terramar USA is fully committed to maintaining the highest standards of transparency, accuracy, and regulatory compliance in all aspects of our business. We take seriously our responsibility to ensure that our independent salesforce communicates appropriately and in alignment with DSSRC and FTC guidelines. Over the past months, we have strengthened our monitoring systems, expanded our compliance training resources, and implemented new tools to support responsible communication practices. Terramar USA remains dedicated to continuous improvement and to fostering a culture of integrity and compliance across our organization."

(Case #240, closed on 11/20/25)

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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](#).

[4] See DSSRC Case #51-2023: LifeWave, Inc. (June 2023).

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