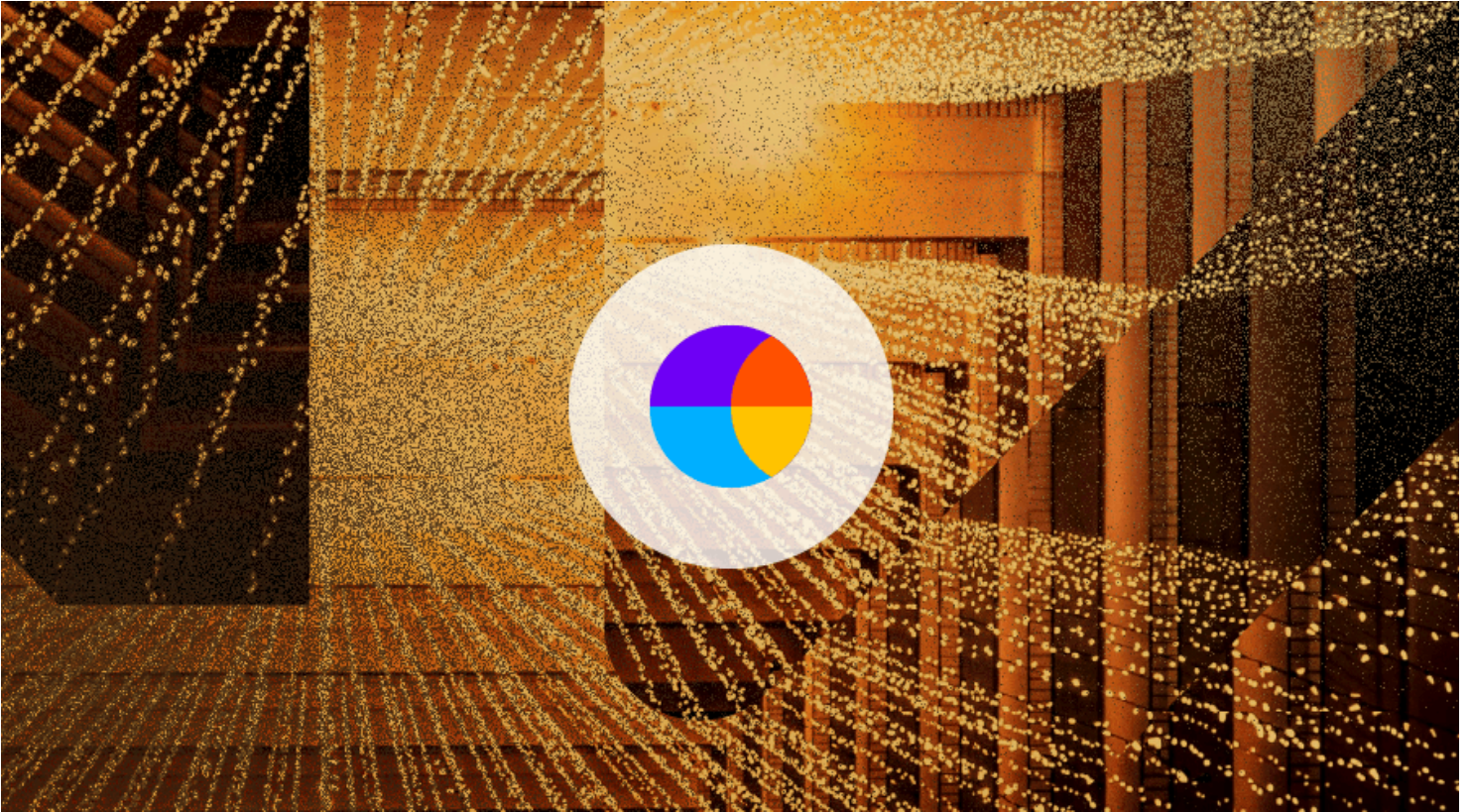


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1. [Home](#)
2. [Programs](#)
3. [Advertising Self-Regulation](#)
4. [Direct Selling Self-Regulatory Council \(DSSRC\)](#)
5. [Administratively Resolved](#)
6. [Case #230-2025: The Partner.Co](#)

Case #230-2025: Administrative Closure - The Partner.Co

BBB NATIONAL PROGRAMS

Direct Selling Self-Regulatory Council

Case #230-2025: Administrative Closure - The Partner.Co

Company Description

The Partner.Co (“Partner.Co” or the “Company”) is a global direct-selling/network marketing company located in Midvale, Utah and was launched in 2023. The Company markets health, wellness, nutrition, beauty, personal care, and lifestyle products.

Basis of Inquiry

The Direct Selling Self-Regulatory Council (DSSRC) operates as a nationwide advertising self-regulation program for the direct selling industry that is managed by BBB National Programs.

DSSRC initiated this investigation as part of its ongoing, independent efforts to monitor advertising practices within the direct selling channel. The review focused on income and product performance claims made by members of Partner.Co's salesforce across platforms including Facebook, TikTok, and YouTube. DSSRC raised concerns that these claims could lead consumers and potential salesforce members to believe that typical participants in the Company's business opportunity are likely to earn significant income, and that Partner.Co's products are effective in treating or alleviating several serious health conditions.

The specific claims that prompted this inquiry are detailed below:

Earnings Claims

1. "Partner.Co offers an incredible opportunity to build your own business, earn a great income, and make a difference in people's lives. With a highly competitive compensation plan...✓ Generous Bonuses...#FinancialFreedom" AND "... This is more than a job – it's a chance to own your business, work on your terms, and achieve the lifestyle you've always dreamed of. (December 2024)
2. "7 title advancements in 7 months! Where else can you start a business that's profitable in a year or two (or less!) with little to no debt and then consistently make a six-figure income working from home?!" (March 2025)
3. "☀️ Earn products, save up for that dream vacation, or get ready for swim suit weather! 🌴 Plus, with expensive sports seasons coming up for the kids, every bit helps! 🏈🏐🏀🏆🏅 And if you're looking to tackle that debt, we've got solutions for that too!... #FinancialFreedom...#DebtFreeJourney 🚀💵📈" (October 2024)
4. "Whether you're looking for a side hustle, a career change, or a way to create financial freedom while making a real impact, this could be the perfect fit for you!... When you join for \$29.95 you have the opportunity to earn \$6,000 this month and more if you run with it! There's nothing better than getting paid to help others!" (February 2025)
5. "Start Your Own Business From Home Where Your Income Is Unlimited..." (August 2024)

Product Claims:

1. "Balanced Hormones; No more night sweats; Balanced Thyroid; Detox Liver; No more mood swings; less achy joints"(October 2024)
 2. "We popping bottles today drinking Noni Juice to boost energy, reduce inflammation, improve mood, reduce joint pain, increase mobility, regulate cycles..."
 3. [0:14] "The Noni Juice is good for inflammation, diabetes, high blood pressure..."
 4. [2:25] "it helps with immunity, bacteria biom[e], mental health, anti-inflammatory response, bone health, cancer fighting response, cell reproduction, cholesterol levels, blood sugar, skin, energy production, and overall well-being." (June 2023)
 5. [0:12]: "strengthened your immune system, boosted your energy, uplifted your mood, supported your overall health"
- [0:53] "support healthy immune and cardiovascular systems, fight free radicals, promote mobility, help balance your mood, and maintain your overall wellness"
- [1:03] "backed by clinical studies, third party testing, decades of research..." (March 2023)

Company's Position

Following receipt of DSSRC's Notice of Inquiry, Partner.Co's Compliance Department promptly reviewed the 10 online product and earnings claims in question. After evaluation, the Company concurred with DSSRC's assessment that the claims did not align with Federal Trade Commission (FTC) Guidance and the Company's Policies and Procedures.

In response to the inquiry, Partner.Co immediately contacted the salesforce members responsible for the posts and requested their removal. In addition, Compliance Specialists engaged with those individuals to provide guidance and education on the Company's marketing policies and compliance expectations. As a result, nine out of the 10 posts were successfully taken down.

Regarding the remaining product performance post, Partner.Co informed DSSRC that the individual responsible for dissemination of the claims failed to respond to multiple requests from the Company's Compliance Department. The Company subsequently initiated disciplinary measures, including suspension of the individual's Partner.Co business and consideration of full termination of their Brand Partner agreement. Partner.Co also shared copies of its outreach efforts with DSSRC and confirmed that it has contacted the relevant social media platform to request the removal of the non-compliant content.

To strengthen its ongoing compliance efforts, Partner.Co informed DSSRC that it has implemented a brand monitoring program administered by a third-party service with expertise in the direct selling industry. The Company also expanded its U.S. Compliance team by adding an additional specialist.

Partner.Co emphasized its commitment to continually improving its ability to educate, monitor, and enforce compliance among its salesforce. The Company reiterated that it acted in good faith throughout the inquiry process — by removing the majority of the flagged posts, educating the involved salesforce members, and taking appropriate disciplinary action in response to noncompliance.

Administratively Closed Resolution

DSSRC acknowledged Partner.Co's prompt response in addressing the concerns in this inquiry and confirmed that the Company voluntarily facilitated the removal of nine of the 10 social media posts that were the subject of the inquiry. DSSRC determined that the good faith efforts of Partner.Co were necessary and appropriate.

Earning Claims

The *FTC Business Guidance for Multi-Level Marketing* ("FTC Guidance") makes clear that earnings claims must accurately reflect what the typical participant can realistically expect to achieve in income, profit, or other financial benefits.¹ The FTC Guidance further cautions that unqualified representations suggesting substantial or atypical earnings—such as promises of financial security—can create a misleading impression for potential recruits, since such results are not typical.² Accordingly, disseminating an unqualified, atypical earnings claim such as one suggesting that a Company representative will receive significant income or financial security from the business opportunity may create an inaccurate impression with a prospective salesforce member. In this regard, if a participant in an MLM or direct selling opportunity makes an income or earnings 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."³

Similarly, the *DSSRC Guidance on Earnings Claims for the Direct Selling Industry* ("DSSRC Guidance") advises direct selling companies and their salesforce members to refrain from using language or imagery that overstates potential earnings. Terms like "financial freedom," without proper qualification, are identified as particularly problematic because they can heighten the risk of consumer deception.

Based on these standards, DSSRC concluded that Partner.Co's actions to remove unqualified and atypical claims—such as promises of unlimited income, monthly earnings of \$6,000, or a six-figure salary—were warranted.

Product Performance Claims

Partner.Co was able to facilitate the removal of four of the five product performance posts brought to their attention by DSSRC and exhibited a genuine, good faith effort to remove the one post that remained publicly accessible.

In the absence of competent and reliable scientific evidence, advertisers must avoid making any claims that suggest their products offer health or safety benefits. This includes, in particular, any representations implying that a product is effective in preventing, treating, or alleviating diseases, medical conditions, or any physical or mental impairments that interfere with normal bodily functions.

According to the FTC's *Health Products Compliance Guidance*, "competent and reliable scientific evidence" refers to research, testing, or analysis that meets rigorous scientific standards. Specifically, such evidence must be conducted and assessed objectively by qualified experts in the relevant field and must be widely recognized within the scientific community as producing reliable and accurate results. Moreover, the body of evidence must be both quantitatively and qualitatively robust—aligned with accepted methodologies in the pertinent scientific disciplines—and must support the truthfulness of the claim when viewed in the context of all relevant and reliable scientific data available.⁴

DSSRC notes that implying that a product has therapeutic or disease-related benefits without proper substantiation not only misleads consumers but also poses serious public health concerns. Such unsupported claims can result in individuals forgoing medically approved treatments in favor of unproven alternatives, potentially leading to delayed care or worsening of health conditions. Advertisers bear a heightened responsibility when promoting health-related products to ensure that all messaging is truthful, evidence-based, and aligned with applicable regulatory standards to protect consumers from deceptive or harmful misinformation.

With respect to the one remaining post that references several specific health conditions for which the product is purportedly efficacious (i.e., inflammation, diabetes, high blood pressure), DSSRC concluded that Partners.Co did not authorize the claims in the post and made a concerted and genuine attempt to have the post removed. More specifically, the Company used its best efforts to contact the individual, providing DSSRC with a copy of the correspondence sent to that person, terminated the account of the former salesforce member when she failed to respond to Partner.Co's request to reconcile the post, and confirmed that it contacted YouTube to advise them of the unauthorized post and request that it be removed. The Company also committed to DSSRC to pursue the request with the platform.

Conclusion

Partner.Co successfully removed all earnings and all but one of the product claims identified in the inquiry. Given the Company's demonstrated good faith efforts to address the remaining product claim, DSSRC administratively closed its inquiry.

Company Statement

"Partner.Co is fully committed to maintaining the highest standards of marketing and compliance within the direct sales industry. The company appreciated the opportunity to engage with the Direct Selling Self-Regulatory Council and has acted in good faith to address and resolve the concerns raised. Partner.Co remains dedicated to implementing the DSSRC's recommendations and will continue strengthening its compliance efforts through ongoing education and consistent enforcement of its policies."

(Case No 230-2025. Closed on 9/23/25)

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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* at Section 13.

[3] *Id*.

[4] Fed. Trade Comm'n, Health Products Compliance Guidance, Section B. Substantiating Claims, 12.
https://www.ftc.gov/system/files/ftc_gov/pdf/Health-Products-Compliance-Guidance.pdf

October 13, 2025

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