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# Case #214-2025: Administrative Closure - Tranont

## BBB NATIONAL PROGRAMS

Direct Selling Self-Regulatory Council

Case #214-2025: Administrative Closure - Tranont

## Company Description

Tranont (or the “Company”) is a multi-level direct selling company based in Utah. Founded in 2013, the Company markets a diverse range of products for metabolic health and digestive function, skincare, and increased energy that are focused on improved health, wellness, and personal care.

## Basis Of Inquiry

The Direct Selling Self-Regulatory Council (“DSSRC”) is a national advertising self-regulation program administered by BBB National Programs. This matter was commenced by DSSRC pursuant to a third-party inquiry and DSSRC’s ongoing independent monitoring of advertising and marketing claims in the direct selling industry.

This inquiry concerns earnings and product performance claims disseminated by Company salesforce members. The representative claims that formed the basis of this inquiry were located on social media accounts of Tranont salesforce members and all but one of the social media posts were communicated on Facebook, with the remaining post appearing on Instagram. The representative claims at issue in the DSSRC inquiry are set forth below.

### *Earnings Claims*

1. “With these incredible new products dropping, it is such a great time to take a leap, whether for your health, finances, or both!!”
2. “We are a health and wellness company with whole food, whole plant supplements, backed by science & we cultivate financial freedom!”
3. “Tranont is holistic-minded, backed by science & they cultivate financial freedom!”
4. “... take the first step towards better health and financial freedom now. Join Tranont and unlock your potential!”
5. “Whether you’re looking to improve your health, finances, or overall well-being, we’re here to guide you every step of the way.”  
And “Financial Growth & Mindset – Strategies to build wealth and financial freedom”
6. “if you want that extra income to help:pay off debt;put away funds for college for the kiddos; “or simply have more financial freedom”
7. “Tranont has been more than just a business opportunity; it’s been a way to empower myself and others to live healthier, wealthier lives.” and “I’ve seen incredible changes—not just in my health, but in my financial future too”
8. “Tranont isn’t just about health and wealth—it’s about empowerment, financial freedom, and a supportive community that helps you grow. Whether you’re looking for better health, extra income, or a life on your own terms, Tranont gives you the tools to succeed!”

### *Product Performance Claims*

1. “Sluggish metabolism? Aging skin? Thinning hair? Stiff and achy joints? Gut issues? Digestive tract issues? Blood sugar issues? Low energy levels? Focus issues? We’ve got you covered! Reach out to your Tranont associate today. 😊 ”
2. “Another fabulous Tranont product I take Everyday...great for my arthritis pain, that’s non existent when I take it!.... ”
3. “I’m no longer feeling like a Leper!! My hands have been covered in big red blisters, now they are dark spots but that’s ok.. also had it all over my face. I avoided a camera for a long time... now, no marks on my face either. I don’t have any of those pics.... I feel great.  
She suffers from Granuloma Annulare. It’s an auto immune condition. There is nothing that I don’t think Tranont can help with. If you want to try and/or have a condition you are worried about and wonder if Tranont can help you, please contact me.”

### **Company’s Position**

Tranont stated that the representations communicated by the salesforce members on the social media posts that were the subject of the inquiry had not been authorized by the Company. Tranont did not attempt to provide support for the subject claims and, instead, assured DSSRC that it worked diligently to facilitate the removal of the identified social media posts.

The Company subsequently informed DSSRC that as a result of its efforts, all 11 of the posts that were brought to Tranont’s attention by DSSRC had been removed.

The Company explained to DSSRC that it routinely engages with its salesforce to provide both educational resources and cautionary messaging related to health and income claims. DSSRC was further informed by Tranont that its executive team leads comprehensive compliance training for the entire field team, with a particular emphasis on health-related claims and uses specific examples included in the Federal Trade Commission’s (FTC) Health Products Compliance Guidance.

Tranont also noted that it conducts field-wide compliance training focused on distinguishing between appropriate and inappropriate earnings claims, as well as on accurately presenting the business opportunity. The training incorporates specific examples drawn not only from DSSRC’s Earnings Claim Guidance, but also from actual violations identified in the course of its compliance oversight.

The Company explained that training on both earnings claims and health-related claims is uploaded and recorded, and copies of the slides are sent to field leaders. Compliance training is conducted by the Tranont legal and sales teams with Diamond level leaders that specifically address violations, answers questions, and provides examples of compliant posts. In addition, calls to Diamonds Level leaders are made by the Company’s executive team to discuss the importance and expectation of compliant behavior in their marketing of the company and its products.

Tranont advised DSSRC that it utilizes an external monitoring service to monitor claims from its salesforce members. The vendor provides weekly reports detailing any identified compliance issues, which are then reviewed by the company's owners and executive leadership on a regular basis.

Lastly, Tranont also provides salesforce members with a suite of compliance resources—including “Do’s and Don’ts,” social media guidelines, quick-reference tips, illustrative examples of compliant and non-compliant posts with explanations, income disclosure statements, and FDA and income disclaimers. These materials are all made accessible to salesforce members through the Company’s back office for ongoing reference. Additionally, the Company hosts leadership training at its corporate headquarters as a core part of the curriculum for future leadership development programs.

### Administratively Resolved Determination

DSSRC appreciated the efforts of Tranont to contact the salesforce members responsible for the social media posts that were the subject of this inquiry, which resulted in all 11 of the posts being completely removed. DSSRC agreed that the Company’s actions were necessary and appropriate.

Direct selling companies and their salesforce members should avoid using any language or imagery that suggests income beyond what the average participant can reasonably expect under similar circumstances—that is, modest or supplemental earnings at most. A fundamental principle of advertising law holds that it is deceptive for a direct selling company or its salesforce members to make any income-related claims unless they: (a) have a reasonable basis for the claim at the time it is made, and (b) possess documentation to substantiate the claim when it is presented.<sup>1</sup>

In this instance, DSSRC determined that the subject earnings claims could lead consumers to reasonably believe they are likely to earn significant income through the Tranont business opportunity.

With respect to the earnings claims at issue in this inquiry, the FTC’s Business Guidance for Multi-Level Marketing (“the FTC Guidance”) states that “any earnings claim should reflect what the typical person to whom the representation is directed is likely to achieve in income, profit, or appreciation.”<sup>2</sup> Further, a multi-level marketer or individual participant making claims about multi-level marketing income must have a reasonable basis for the claims disseminated to current or prospective participants about the business opportunity at the time it makes the claims.<sup>3</sup> 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>4</sup> The FTC Guidance further notes that given the reality of multi-level marketing experiences, even truthful testimonials of individuals who earn large amounts of money or career-level money is atypical and not representative to what most multi-level marketer participants will achieve.<sup>5</sup> Therefore, presenting atypical earnings “is likely to generate a deceptive impression” of the earning potential of a given business opportunity.<sup>6</sup> Moreover, when referencing income that would not be typically expected by Company salesforce members, such claims must be accompanied by a *clear and conspicuous* disclosure (i.e., in close proximity to the target claim) regarding the income that can be generally expected by the typical salesforce member in the depicted scenario. Such claims should also be otherwise truthful and non-misleading.

Regarding the product performance claims at issue, the FTC expects that advertisers have a reasonable basis for all product claims, and the standard of substantiation for health-related product claims is particularly rigorous. The FTC has defined the health claim substantiation standard as requiring “competent and reliable scientific evidence” in the form of “tests, analyses, research, or studies that (1) have been conducted and evaluated in an objective manner by experts in the relevant disease, condition, or function to which the representation relates; and (2) are generally accepted in the profession to yield accurate and reliable results.”<sup>7</sup> Health claim substantiation evidence must generally take the form of randomized, controlled human clinical trials (“RCT”), with animal and in vitro studies generally being insufficient without RCT confirmation, and anecdotal evidence being insufficient.<sup>8</sup> Moreover, the evidence relied upon must be relevant to the advertised product with respect to, among other things, dosage, formulation, and method of administration.<sup>9</sup>

Based upon Tranont’s voluntary, good faith actions to remove all 11 social media posts identified by DSSRC, the inquiry was administratively closed.

### Company Statement

"At Tranont, we are committed to maintaining the highest standards of integrity and transparency in all of our business practices, including those related to health and income claims made by our independent salesforce. We respect and appreciate the role of the Direct Selling Self-Regulatory Council in supporting accountability and best practices within our industry and we agree with the recommendations made by DSSRC. We will continue to diligently monitor and enforce our policies as well as look for and invest in opportunities to provide additional training and sales tools to our sales force through multiple channels. We are proud to be a part of an industry that values integrity and self-regulation, and we will continue to lead by example in these critical areas."

(Case #214, Closed on 05/08/25)  
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[1] Direct Selling Self-Regulatory Council Guidance on Earnings Claims for the Direct Selling Industry, General Principles.

[2] *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>.

[3] *Id.* at Section 18.

[4] *Id.*

[5] *Id.* at Section 13.

[6] *Id.*

[7] *Id.* at Section II (A), Section III (B).

[8] *Id.* at Section III (B), Section III (B)(2).

[9] *Id.* at Section III (B)(5).

May 17, 2025

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