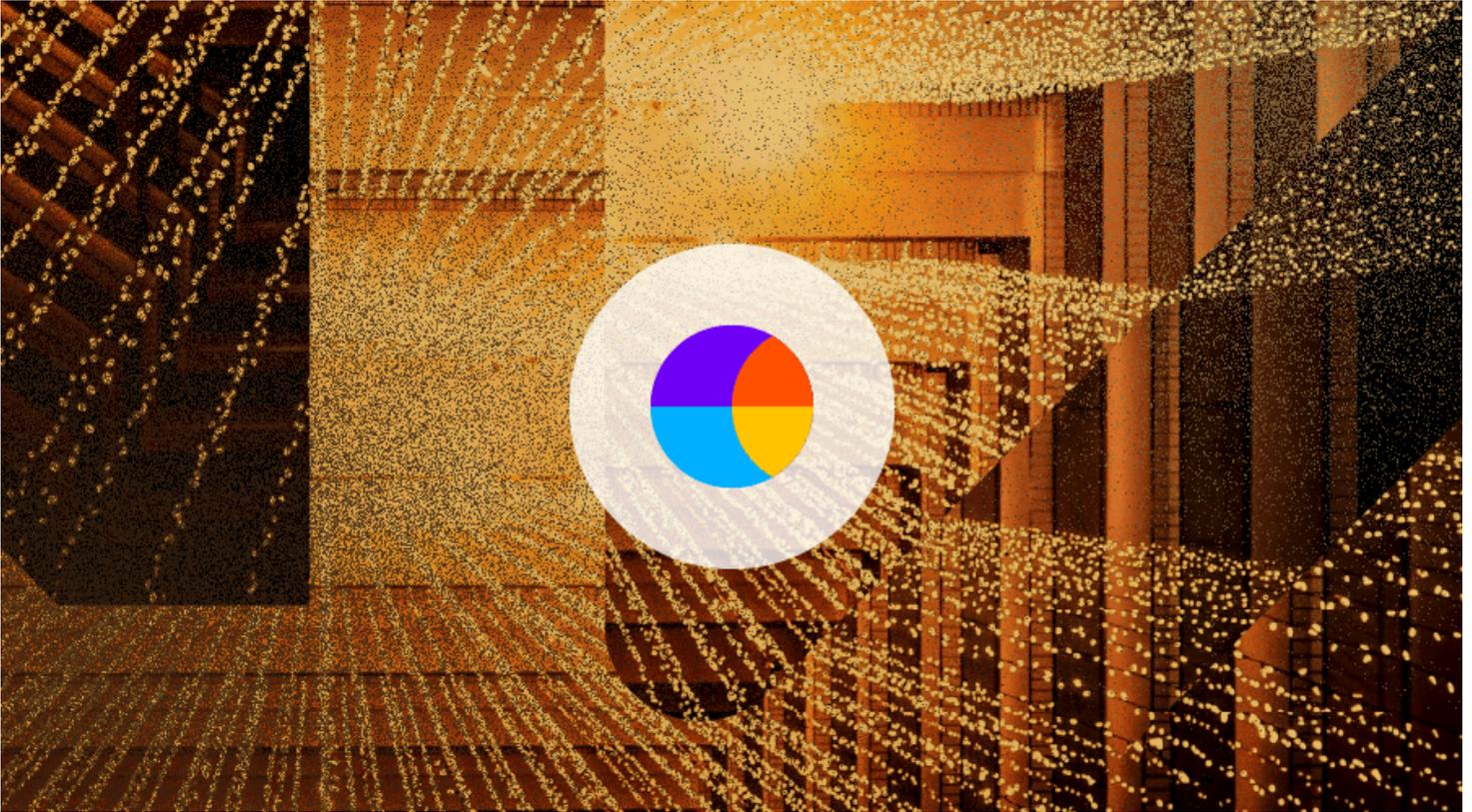


- [RMAI Services](#)
- [TeenAge Privacy Program](#)
- [Vendor Privacy Program](#)
- [Volkswagen Car-Net & Audi Connect](#)

## Our 501c3 Foundation



[Learn About CISR](#)

[What Is BBB National Programs?](#)

1. [Home](#)
2. [Programs](#)
3. [Advertising Self-Regulation](#)
4. [Direct Selling Self-Regulatory Council \(DSSRC\)](#)
5. [Case Decisions](#)
6. [Case #248-2026: Vivint Smart Home, Inc.](#)

# Case #248-2026: Monitoring Inquiry – Vivint Smart Home, Inc.

## BBB NATIONAL PROGRAMS

Direct Selling Self-Regulatory Council

Case #248-2026: Monitoring Inquiry – Vivint Smart Home, Inc.

## Company Description

Vivint Smart Home, Inc. (“Vivint” or the “Company”) is a smart home technology company headquartered in Lehi, Utah, that was founded in 1999. The Company offers professionally installed and monitored smart home systems, including home security systems, smart cameras, doorbell cameras, smart locks, thermostats, lighting controls, and related home automation services and accessories.

## 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, TikTok, and YouTube.

### *Earnings Claims*

1. “I’ve been able to experience financial freedom at 19-21 years old” (January 2024)
2. “financial freedom” (June 2024)
3. Screenshot of earnings with copy stating “We work 5 months mainly out of the year during the Summer time to produce our income. This is what I made in 5 months helping protect families + one of my last checks.”
  - o “1. Financial Freedom... 6. No Limits to Career Growth or pay” (November 2021)
4. Screenshots of earnings with copy stating “We work 5 months mainly out of the year to produce our income. This is what I made in 5 months plus one of last checks... 1. Financial Freedom... 5. No Limits to Career Growth or pay 🍷” (October 2021)
5. Image of compensation plan based on salesforce member’s rank with copy stating “Here at Vivint we create financial freedom!” (February 2023)
6. “#FinancialFreedom” (March 2025)
7. “**2** People interested in working part-time to earn \$1,000 to \$5,000 a month, with flexible hours and no quotas and can work remotely.
8. “**3** People open to exploring a career opportunity in financial services. The average broker/owner earns \$150,000 a year with unlimited income potential. This is the goal I am working toward in the next 12 months.” (February 2025)
9. “One of my agents is known as the "Vivint Queen" 👑 and has been generously 🧑💻 compensated for simply making a 10 min call or referring clients and she earns a minimum of \$250 each time plus gift cards, iPad etc. The incentives are amazing 🧑💻 On my personal install I made \$500 💎 That alone reimbursed me 4xs the business start up cost 😊😁” (April 2025)
10. “Please message me today to get started on your journey to financial freedom!” (July 2025)
10. Screenshots of estimated total income with copy stating “1. Financial Freedom...
  - 7. No Limits to Career Growth
  - 2020: \$85k->2021: \$149k
  - Love to see a \$65k pay raise.” (October 2021)
11. “This is the time to get in—whether you’re looking for career growth, financial freedom, or a community of high performers... #FinancialFreedom”
12. “Let’s also talk about Financial Freedom like retirement, IRA, Annuities, Securities and more!”
13. “build financial freedom...
  - Here’s how I can help:
    - ◆ Income Protection (aka Life Insurance) – so if the unthinkable happens, your loved ones can keep the lights on. ◆ Retirement Planning – so your golden years are golden (not ramen-filled). ◆ Debt Elimination Strategies – because drowning in debt isn’t the dream. ◆ Savings Acceleration – helping your money hustle harder than ever.”
14. “Making \$120,000 in 4 months is not easy. You’re making roughly \$30,000 a month is insane”
  - “#35kmonth” (January 2025)
15. YouTube video with several testimonials - “\$71,250 that’s in 3 months I could double that in 3 more months... I am going to sacrifice for 4 months so that I can have 8 months off...Made 20 grand this summer selling for Vivint and I will definitely clear 6 figures by the end of this Thursday...I made 52 thousand dollars over the summer, knocking on doors...this year going into summer as a year two rep. I am already at 71 thousand dollars...projected to make anywhere between 100-120 thousand in a 4-month span... My last paycheck for last week was \$2,000... it was \$2,000 for one week... You get free rent if you make a solar deal, so I already have free rent and last week I closed 2 solar deals, so I made around \$10,000...So last summer you made 13 thousand... and I bumped it up to 74 grand...Ended up making 92 thousand in a four-month period and at that point it ended up changing my life.” (November 2022)

## Company's Position

Vivint maintained that it had carefully reviewed the 15 social media posts identified by DSSRC and asserted that the earnings-related statements reflected therein were generally consistent with earnings that may be achieved by successful Vivint sales agents. Vivint contended that the posts largely reflected personal narratives shared by individuals regarding their own experiences working with the Company and were not intended to convey typical, guaranteed, or broadly applicable income results to prospective sales agents.

Vivint further maintained that the context of the majority of the posts was critical to understanding their net impression. According to the Company, many of the posts described personal growth, work ethic, or individual achievement rather than making generalized recruiting claims. Vivint asserted that, even where phrases such as “financial freedom” appeared, the posts did not depict lavish lifestyles, promise specific income levels to others, or suggest that similar results were typical or easily attainable.

The Company noted that at least five of the posts predated Vivint's acquisition by NRG Energy, Inc. in March 2023, and that several other posts were undated. Vivint stated that this timing was relevant because it had continued to mature and formalize its compliance infrastructure following the acquisition. Vivint did not concede that earlier posts were improper but asserted that it had enhanced its compliance culture and social media oversight as part of its integration into a larger corporate organization.

Vivint also maintained that prospective sales agents were provided with transparent information regarding compensation through the Company's recruitment materials, which prominently disclosed median earnings based on role and experience. According to the Company, these disclosures ensured that individuals considering opportunities with Vivint received accurate information regarding expected earnings regardless of individual social media posts.

With respect to specific posts identified by DSSRC, Vivint asserted that several primarily promoted Vivint's home security products and limited-time consumer offers rather than the business opportunity. The Company further explained that some posts referenced financial services, insurance products, or other business activities unrelated to Vivint, and that any references to “financial freedom” or similar concepts in those posts were attributable to those other businesses rather than to Vivint's sales opportunity.

Vivint acknowledged that one post contained an earnings slide that was not authorized for social media use. Nonetheless, Vivint maintained that the slide included qualifiers referencing top-performing sales agents and accurately reflected earnings that could be achieved by individuals in those categories.

Vivint emphasized that it had taken significant and good-faith steps to promote a robust compliance culture, which DSSRC had previously acknowledged. The Company represented that it had long maintained social media policies and training, and that these efforts had been further strengthened following the hiring of a dedicated Social Media Training and Compliance Manager in August 2025. According to Vivint, this individual was responsible for monitoring social media content related to the Company, coaching sales agents on permissible posts, requesting takedowns or revisions of questionable content, and developing enhanced training modules, including monthly guidance designed to provide practical social media best practices.

Vivint further represented that all sales agents were subject to NRG Energy's Social Media Policy, which prohibited false or misleading representations and required disclosure of affiliation with the Company. Vivint stated that all sales agents, including both returning and new agents, were required to undergo annual training and that these longstanding and enhanced efforts reflected the Company's best efforts to ensure that salesforce members refrained from communicating unsubstantiated or overly embellished earnings claims.

Vivint detailed its efforts to address the posts identified in the Notice of Inquiry, representing that, of the 15 posts identified by DSSRC, 10 had been removed and one had been modified to address DSSRC's concerns. Vivint further stated that the remaining posts were attributable to former sales agents or third parties beyond the Company's direct control, but that the Company nonetheless contacted the relevant individuals and requested removal, with most of those posts having been taken down and follow-up efforts ongoing with respect to the remainder.

Vivint maintained that these takedown efforts, combined with its written assurances and enhanced compliance measures, demonstrated bona fide, good-faith efforts consistent with DSSRC Procedures. The Company asserted that the posts identified by DSSRC did not reflect a significant pattern of problematic conduct but instead represented a small number of social media posts generated over several years by individuals associated with a large salesforce. Vivint further stated that its decision to remove or seek modification of posts was undertaken in the spirit of cooperation and should not be construed as an admission that the posts were improper.

Based on the foregoing, Vivint maintained that the earnings claims at issue were substantiated, contextualized, and not misleading, and that the Company's ongoing investments in social media compliance and training further mitigated any potential consumer confusion.

## Analysis

DSSRC acknowledged Vivint's cooperation with the self-regulatory process and its detailed response to the Notice of Inquiry. DSSRC further recognizes the Company's representations concerning its investment in compliance infrastructure, including the maintenance of

social media policies, required training for sales agents, and the recent hiring of a dedicated Social Media Training and Compliance Manager. In addition, DSSRC took note of Vivint's efforts to remove or modify most of the posts identified in this inquiry, as well as its ongoing efforts to seek the removal of remaining posts created by former sales agents or third parties.

Specifically, Vivint voluntarily removed 10 of the 15 posts identified by DSSRC and facilitated the modification of another post to address DSSRC's concerns. DSSRC concluded that the Company's actions were necessary and appropriate.<sup>1</sup>

Notwithstanding, DSSRC remains concerned that several of the social media posts disseminated by Vivint salesforce members, which remain publicly accessible, conveyed messages that could be reasonably interpreted by prospective salesforce members as meaning that participants in the Vivint business opportunity typically earn significant income and/or attain financial freedom. In this context, pursuant to the 1984 Federal Trade Commission (FTC) Policy Statement Regarding Advertising Substantiation, advertisers are responsible for substantiating *all* reasonable interpretations of a claim, not just the one they intend to convey.<sup>2</sup>

Two of the four social media posts that have not been reconciled include references to salesforce members attaining "financial freedom" through the Company's business opportunity, including one post that further implies there are no limits on career progression or compensation.

In previous inquiries involving income-related claims, DSSRC has reviewed a number of claims related to "financial freedom" and aspirational income representations—particularly unqualified references to "financial freedom" (and similar terms such as "financial stability" and "financial independence"). Such terms have long been associated with consumer confusion and reputational concerns within the direct selling industry. In recent years, the industry has made meaningful progress in reducing reliance on this terminology in marketing materials, reflecting an increased awareness of its potential to mislead consumers and invite regulatory scrutiny. DSSRC has noted that when such claims are presented without clear context or qualification, they communicate an imprecise and potentially misleading message to consumers and prospective salesforce members. Absent appropriate qualification, DSSRC has concluded that it is reasonable for a consumer or prospective participant to understand the term "financial freedom," (and similar terms) in an unqualified context, to suggest that participation in the business opportunity will eliminate financial concerns or result in a materially transformative level of income.

One other post, disseminated in 2022, which remains accessible on YouTube referenced Vivint salesforce members earning income from the business opportunity (e.g., \$71,250 in 3 months, \$52,000 in one summer, \$2,000 in one week, \$74,000, etc.). Vivint attempted to contact the inactive salesforce member to have the video removed but was unsuccessful. Notwithstanding the Company's remedial actions, DSSRC determined that the continued public availability of the video raised ongoing concerns.

As noted in section 13 of the FTC's Business Guidance Concerning Multi-Level Marketing:

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 to consumers considering an income opportunity is likely to generate a deceptive impression.<sup>3</sup>

DSSRC further determined that the explicit earnings representations conveyed in the YouTube video reflected results that were so atypical of what a typical Vivint salesforce member could reasonably expect to earn that the claims were not capable of being cured through qualification, even with clear and conspicuous disclosures. Consistent with Section 10 of the DSSRC Guidance on Earnings Claims, DSSRC recognizes that certain income or lifestyle representations—by virtue of the level of success they depict—may be so extreme that disclosure of generally expected results is insufficient to prevent consumer misunderstanding.<sup>4</sup>

DSSRC agreed with Vivint's assertion that one of the remaining posts that referenced "financial security" and "financial freedom" from financial services, insurance, or other business opportunities unrelated to the Company would not be reasonably interpreted as being attributable to the Vivint opportunity. As such, DSSRC determined that Vivint did not bear the burden of seeking the removal of this post.

With respect to the other three posts discussed above that remain publicly accessible in their original context, DSSRC has noted in previous inquiries that if a claim by a former or suspended salesforce member appears on a website or platform without an available reporting mechanism, DSSRC recommends that the company contact the platform in writing to request removal of the post. Documenting these outreach efforts will serve as evidence of the company's proactive, good-faith compliance efforts.<sup>5</sup> Here, DSSRC acknowledges the Company's good-faith efforts to contact the relevant individuals responsible for disseminating the posts and seek modification or removal. Notwithstanding these efforts, DSSRC recommends that the Company take the additional step of contacting the social media platforms on which the posts appeared, including Facebook and YouTube, to advise them that the claims were not authorized by the Company and to request removal of the content.<sup>6</sup>

In light of the foregoing, DSSRC concluded that Vivint has demonstrated bona fide, good-faith efforts to address those concerns. DSSRC further concluded that the Company's enhanced compliance measures, training, monitoring, and takedown efforts are consistent with DSSRC Procedures and are reasonably designed to mitigate the risk of future dissemination of unsubstantiated or misleading earnings claims.

## Conclusion

DSSRC concluded that Vivint has demonstrated a bona fide, good-faith effort to address the concerns in this inquiry by facilitating the removal of 10 of the 15 posts identified by DSSRC and facilitated the modification of another post. DSSRC further determined that one of the posts identified in the inquiry would not be reasonably interpreted as being attributable to the Vivint opportunity. With respect to the three remaining posts, which remain publicly accessible, DSSRC acknowledged the action taken by Vivint to contact the inactive salesforce members and further recommended that the Company take the additional step of contacting the social media platforms on which the posts appeared to advise them that the claims were not authorized by the Company and to request removal of the claims at issue.

## Company Statement

“We appreciate the opportunity to have participated in this self-regulatory review process alongside the DSSRC and remain committed to ensuring that all claims and representations made about our business are accurate and compliant with applicable guidelines and standards. We also value the DSSRC’s conclusion that our compliance measures, training, monitoring, and other efforts are consistent with such standards, procedures, and reasonably designed to mitigate the risk of future dissemination of unsubstantiated or misleading claims of this nature. We will continue to review and refine our processes to help ensure all future company representatives adhere to the applicable guidelines and standards.”

(Case No. 248, closed on 01/22/26)

© 2026. BBB National Programs

[1] DSSRC also acknowledged Vivint’s representations that it requested removal of remaining posts attributable to former sales agents or third parties and that most of those posts have been taken down, with follow-up efforts ongoing. DSSRC has consistently recognized that companies cannot always compel compliance from former salesforce members or unaffiliated third parties and evaluates such efforts based on good-faith attempts to request removal and prevent recurrence.

[2] See FTC Policy Statement Regarding Advertising Substantiation, 104 F.T.C. 648, 839 (1984) “One issue the Commission examined was substantiation for implied claims. Although firms are unlikely to possess substantiation for implied claims they do not believe the ad makes, they should generally be aware of reasonable interpretations and will be expected to have prior substantiation for such claims.”

[3] See section 13 of the FTC’s Business Guidance Concerning Multi-Level Marketing at <https://www.ftc.gov/business-guidance/resources/business-guidance-concerning-multi-level-marketing>

[4] See [dssrc\\_guidanceonearningsclaimsforthedirectsellingindustry.pdf](#).

[5] See DSSRC Case #239-2025: Global Organics Merchants, LLC d/b/a LoveBiome (December 2025) at <https://bbbprograms.org/media/newsroom/decisions/love-biome>.

[6] With respect to Vivint’s argument that several posts predated its acquisition by NRG Energy, Inc. in March 2023, DSSRC acknowledges that corporate acquisitions can result in evolving compliance practices and oversight. However, DSSRC has consistently held that the age of a claim does not, by itself, resolve concerns regarding the dissemination of potentially misleading earnings claims, particularly where such claims remain publicly accessible. DSSRC does, however, give weight to Vivint’s representations that its compliance culture and monitoring efforts have been enhanced following the acquisition.

February 12, 2026

## Subscribe to Stay Up-to-Date