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BBB NATIONAL PROGRAMS

Direct Selling Self-Regulatory Council

Case #225-2025: Administrative Closure - Zinzino AB (Asset Purchaser of Valentus Global, Inc.)

Company Description & Background

Valentus Global, Inc. (“Valentus”) was a U.S.-based direct-selling company founded in 2014, specializing in nutritional supplements, weight-management beverages, and wellness products. The company operated primarily through an independent salesforce and marketed its offerings via direct sales and social media outreach. Prior to its acquisition, Valentus maintained a U.S. corporate presence in Sioux Falls, South Dakota, and later in Orlando, Florida.

This inquiry pertained primarily to social media advertising content created and disseminated by members of the Valentus independent salesforce. The posts in question were published before Zinzino AB (“Zinzino” or “the Company”), a Sweden-based health and wellness company, acquired Valentus’ distributor organization, customer base, product inventory, and intellectual property portfolio. The acquisition was completed on April 11, 2025, through an asset purchase.

Following the acquisition, Zinzino became the owner of the Valentus brand assets, but the social media posts at issue predate that transaction and were made while Valentus operated independently. Accordingly, this inquiry predominantly focused on advertising practices carried out under Valentus prior to the asset transfer to Zinzino.¹

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 process, which monitors advertising and marketing claims disseminated by direct selling companies and their salesforce members.

This inquiry concerned earnings claims disseminated by Company salesforce members on Facebook and included one implied claim disseminated on the Zinzino website. DSSRC was concerned that the earning claims that were the subject of this inquiry communicated the message that the typical Valentus salesforce member can earn significant income through the Company’s business opportunity. The representative claims that formed the basis for DSSRC’s inquiry are set forth below:

Earnings Claims

1. “I also watched over 700 of my team quit jobs & cut down working hours thanks to the opportunity! It’s been the most incredible journey 🥰” (January 2023)
2. “✓ Unlimited earning potential – Your income is directly tied to your effort and dedication.” (February 2025)
3. “Whether you're chasing financial freedom, personal growth, or a powerful community, we’ve got you covered. #FinancialFreedom” (February 2025)
4. “At Valentus Global, we’re passionate about helping people achieve their dreams — whether that’s better health, financial freedom, or both. It’s not always easy, but with hard work and determination, success is within reach. 🙌💰” (March 2025)
5. “Are you ready to transform your life 🚀, build financial freedom 💰, and be part of a thriving international team? 🌍👤 Valentus Global is offering a WORLDWIDE OPPORTUNITY for ambitious individuals who want more out of life! #FinancialFreedom” (February 2025)
6. “... whether that’s better health, financial freedom, or both.” (March 2025)
7. “At Valentus Global, we’re passionate about helping people achieve their dreams — whether that’s better health, financial freedom, or both. It’s not always easy, but with hard work and determination, success is within reach.” (March 2025)
8. “A proven business model with unlimited earning potential... Whether you're looking to earn extra income or build a full-time career, this opportunity is tailored to meet your goals. #FinancialFreedom” (March 2025)
9. “Flexibility, freedom, and potential financial growth! #FinancialFreedom” (March 2025)
10. “#financialfreedom” (September 2024)
11. “Discover the potential for financial freedom with Valentus Global. Join us and unlock the path to your financial independence! 📁🔑 #ValentusOpportunity #PotentialFinancialFreedom” (May 2024)
12. “Looking for a side hustle that can turn into a full-time income? Join Valentus Global and discover the power of residual income. Your journey to financial stability starts now! 📁💰 #ValentusIncome #PassiveIncome” (June 2024)
13. Depiction of stack of money on website video.

Company’s Position

In its initial response to DSSRC, Zinzino explained that one month before DSSRC commenced the subject inquiry, it acquired Valentus Global’s distributor organization, customer base, inventory, and IP rights to the product portfolio.

Notwithstanding, shortly after receiving the DSSRC Notice of Inquiry, in an effort to demonstrate its commitment to responsible business practices, Zinzino took immediate action to address DSSRC’s concerns.

More specifically, although Zinzino did not attempt to substantiate the earnings claims at issue, it instead made a concerted effort to contact the individuals responsible for disseminating the claims at issue and requested that they reconcile the posts. As a result, Zinzino was successful in removing or significantly modifying 10 of the 13 claims brought to the Company’s attention. Zinzino also informed DSSRC that the three posts that remain publicly accessible in their original context were communicated by individuals that did not migrate to Zinzino as a consequence of the acquisition of Valentus.

Nevertheless, Zinzino attempted to contact those individuals and request that they remove the unauthorized claims. After the Company did not receive a response from the inactive salesforce members, it reached out directly to Meta to request removal of the social media posts. The Company provided copies of the correspondence to the individuals and the social media posts to DSSRC as a demonstration of its good faith efforts.

Administratively Closed Resolution

DSSRC appreciated the actions taken by Zinzino to remove or modify 10 of the 13 online claims identified in this inquiry, all but one of which were originally published prior to the Company's acquisition of Valentus' assets. Rather than attempting to substantiate the earnings claims made by Valentus salesforce members with data, Zinzino chose to focus on eliminating the problematic claims or revising them to ensure compliance. DSSRC concluded that these actions were both appropriate and necessary.

As a core tenet of advertising law, the burden of substantiating any reasonable interpretation of a claim rests with the advertiser.² The Federal Trade Commission's 2024 *Business Guidance Concerning Multi-Level Marketing* ("FTC Guidance") makes clear that MLM companies and their representatives must possess a reasonable basis for any income-related claims shared with current or prospective participants. "Reasonable basis" is defined as credible, empirical evidence—far beyond subjective beliefs or anecdotal examples. Making income claims without such support is considered deceptive.³

In the subject inquiry, DSSRC was particularly concerned with posts suggesting that participants could earn unlimited or full-time income, leave their current employment, and achieve "financial freedom" through the direct selling business opportunity. Absent data showing that a typical Valentus salesforce member could generally expect such outcomes, DSSRC agreed that Zinzino's decision to pursue the removal of these online claims was warranted.

The FTC Guidance cautions that representations implying career-level income, the ability to replace job earnings, pay off debt, or achieve substantial supplemental income are deceptive when participants generally do not experience these results or when the MLM lacks objective data to evaluate these outcomes.⁴ Similarly, DSSRC's *Guidance on Earnings Claims for the Direct Selling Industry* identifies certain terms and phrases as inherently problematic when presented to a general audience. These include statements such as "quit your job," "be set for life," "unlimited income," "full-time income," "career-level income," "replacement income," and other language conveying unrealistic or unsubstantiated financial success.⁵

DSSRC has also consistently expressed concern about claims implying "financial freedom" or "financial independence." These terms, which are often understood synonymously, carry a high risk of misleading consumers when used in a general context to promote a direct selling opportunity.⁶

Regarding the three social media posts that remain publicly accessible, DSSRC determined that Zinzino made a good faith effort to resolve the unauthorized claims. The Company attempted to contact the inactive salesforce members responsible for the posts and, when those attempts failed, submitted formal takedown requests to the relevant platforms. Zinzino provided DSSRC with documentation of its outreach efforts as well as copies of its correspondence with Meta.⁷

Conclusion

Based on the Company's successful resolution of the majority of the claims and its documented efforts to address the remaining posts, DSSRC concluded that Zinzino demonstrated a sincere commitment to compliance. Accordingly, the inquiry was administratively closed.

Company Statement

Zinzino has taken the required steps to work with the DSSRC and complete the investigation requirements. Zinzino is fully committed to truthfulness and transparency when promoting our business and product opportunity. Our favorable reputation with consumers and industry peers alike is a source of great pride for us and something we endeavor to protect. We will continue to identify and act on opportunities to provide further compliance training and tools to our sales force."

The owners and executive staff take the regulatory guidance seriously and are committed to remaining compliant. We thank the DSSRC for its patience and guidance as well as the opportunity to learn and revise and remove non-compliant posts. It is also important to note that some of the infractions were under Valentus Global Enterprises and not Zinzino. Valentus Global Enterprises is now out of business.

To further strengthen our compliance efforts, we have implemented tools to proactively monitor our Independent Partners, ensuring they adhere to our ethical and regulatory standards. Additionally, we are continuously improving our compliance framework and are excited that we were able to launch our new Marketing Rules and Ethics Policy last month.

We will continue to identify and act on opportunities to enhance compliance training and provide valuable tools to our sales force, ensuring they uphold the highest ethical standards in every aspect of their work."

(Case #225, closed on 7/28/25)
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[1] The subject inquiry also included a visual depiction as presented on a video on the Zinzino website.

[2] *See* 1984 FTC Policy Statement Regarding Advertising Substantiation - <https://www.ftc.gov/legal-library/browse/ftc-policy-statement-regarding-advertising-substantiation> Appended to Thompson Medical Co., 104 F.T.C. 648, 839 (1984), *aff'd*, 791 F.2d 189 (D.C. Cir. 1986), *cert. denied*, 479 U.S. 1086 (1987).

[3] FTC Business Guidance Concerning Multi-Level Marketing, FTC Staff, Section 15 (Apr. 30, 2024).

[4] *Id.*

[5] *See* DSSRC Guidance on Earnings Claims, section 6 at [dssrc_guidanceonearningsclaimsforthedirectsellingindustry.pdf](#).

[6] *See* – Thrive Life, LLC, Case #220-2025; Total Life Changes, LLC Case #217-2025; Tranont, Case # 214-2025.

[7] DSSRC further recommended that the Company consider adding a comment to the posts informing the public that the earnings claims were not authorized and that the Company has made efforts to contact the individuals responsible to have the content removed or modified.

August 13, 2025

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