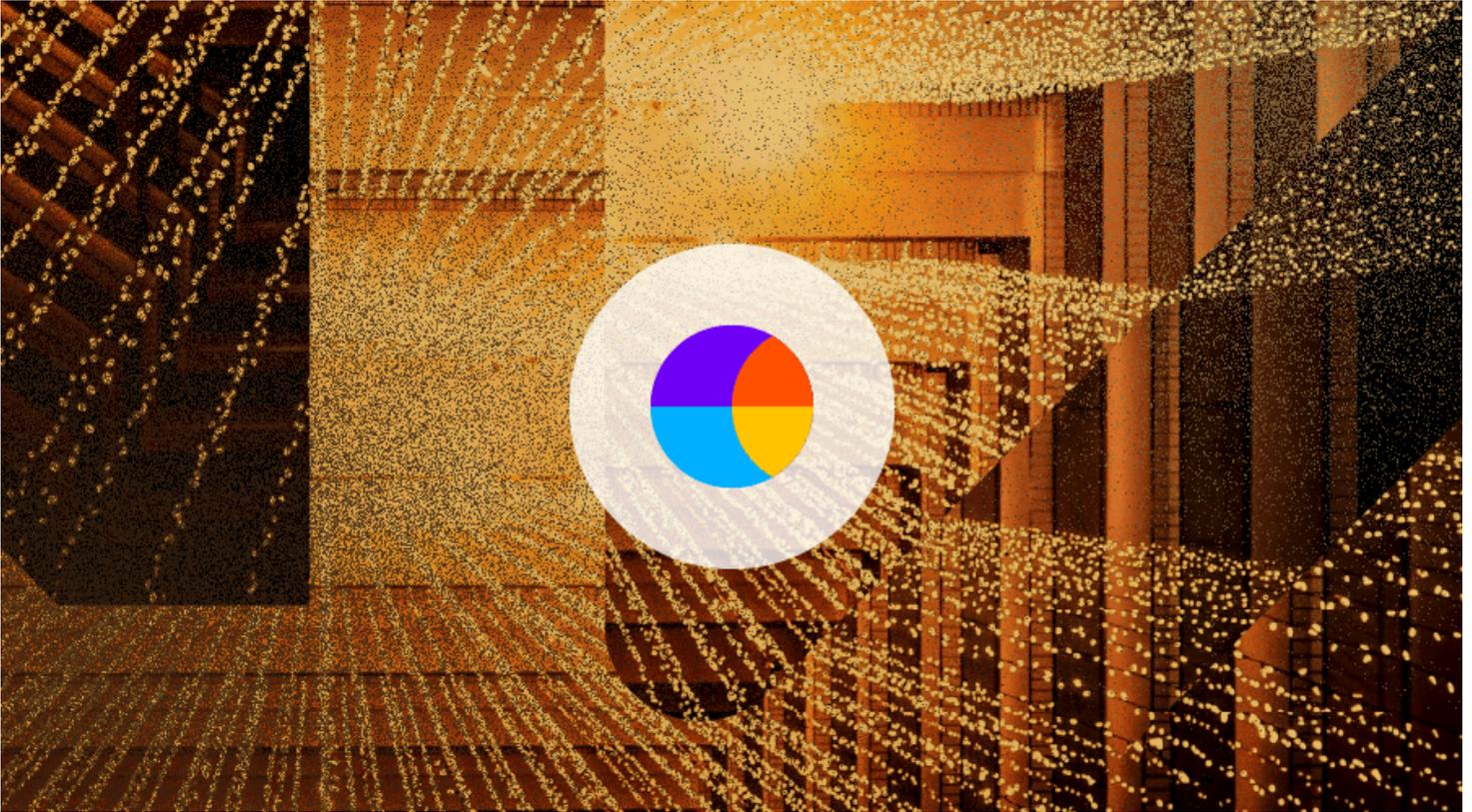


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# Case #249-2026: Administrative Resolved Inquiry – doTERRA, Inc.

## BBB NATIONAL PROGRAMS

Direct Selling Self-Regulatory Council

Case #249-2026: Administrative Resolved Inquiry – doTERRA, Inc.

## Company Description

doTERRA, Inc. ("doTERRA" or the "Company") is a direct selling company that sells essential oils and other related products. The Company was founded in 2008, and is headquartered in Pleasant Grove, UT.

## 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 all disseminated on Facebook.

### *Earnings Claims*

1. “doTERRA has a way to build towards financial freedom—without having to take a huge risk or quit your job overnight. If you’re also looking for something more, let’s talk! This could be exactly what you need.” (April 2025)
2. “The opportunity to create stable income”; “\$300 to \$600/month; \$800 to \$1500/month; \$2000 to \$3000/month; \$4500 to \$15,000+” (April 2025)
3. “FINANCIAL FREEDOM ILL HEALTH FREEDOM” (August 2025)
4. “You want to both elevate your wellness journey and have the opportunity to transform your financial future. 🌈👉” (September 2023)
5. “Would an extra \$500 a month help with groceries?... When I started my journey with doTERRA, I never imagined how much of an impact it would have—not just on my family’s wellness but on our financial freedom too. Whether you’re looking for a side income or something bigger, this business offers flexibility, purpose, and the chance to help others while earning. If you could use an extra \$500 (or more), let’s chat! This could be exactly what you’ve been looking for. #FinancialFreedom” (March 2025)
6. “What legacy are you leaving for the next generation? ☆Earn with doTERRA: Your Path to Financial Freedom”<sup>1</sup> (August 2024)
7. “My Journey to doTERRA: Achieving Financial Freedom & Helping Others.... I took a leap of faith & left my job to pursue doTERRA full-time. Since then, I have found the financial freedom & flexibility I was seeking while also being able to help others.” (October 2023)
8. “Whatever your financial goals, doTERRA has a solution for you. What would you do with an extra \$300 a month? \$2,000 a month? \$10,000 a month?” (September 2025)
9. “I took a leap of faith & left my job to pursue doTERRA full-time. Since then, I have found the financial freedom & flexibility I was seeking while also being able to help others” (October 2023)
10. “I feel that no one deserves to have diseases that are preventable such as diabetes and cancer. Now I know there is a better way ❤️ I also want to give others the opportunity to have financial freedom that is in abundance if you are willing to invest your time and effort in your own business ❤️ just know you will always be your favorite boss 🥰❤️” (November 2025)
11. “Are you looking for more freedom, purpose, and financial abundance in your life? With doTERRA, you can create a business that not only supports your family but also helps others live healthier, more empowered lives.” (September 2025)

### **Company’s Position**

The Company informed DSSRC that it maintains a comprehensive and proactive compliance program designed to prevent salesforce members from making false or misleading earnings claims. According to doTERRA, a central component of this program is a multi-faceted training initiative focused specifically on claims education. The Company also explained that it actively monitors salesforce member conduct and has established internal procedures to promote compliance with doTERRA policies.

The Company stated that its Compliance Department is primarily responsible for educating, training, and monitoring salesforce members and for taking enforcement action when necessary.

doTERRA further explained that, upon enrollment, each salesforce member contractually agrees to comply with Company policies as well as all applicable federal, state, county, and municipal laws, including laws governing product and earnings claims. To support compliance, doTERRA regularly provides claims-related training and educational materials to its salesforce members. These resources include earnings claims guidance available on the Company’s website and written materials, such as the doTERRA’s *Earnings Quick Claims Guide*, intended to help salesforce members understand how to make compliant claims.<sup>2</sup> The Company also represented that its Compliance Department routinely reminds salesforce members that it is available to answer questions regarding permissible and prohibited claims and provides additional coaching and training as needed.

doTERRA advised DSSRC that it devotes significant resources to identifying and addressing non-compliant claims. As part of its monitoring efforts, the Company uses an automated search tool to scan the Internet and social media platforms for potentially non-compliant claims made by salesforce members. doTERRA also conducts regular manual searches to identify and address claims that may violate Company policies.

According to the Company, when a non-compliant claim is identified, the Compliance Department contacts the salesforce member to provide education and request that the claim be removed or modified. doTERRA indicated that salesforce members generally comply with these requests. If a salesforce member fails to respond or does not take corrective action, the Company explained that it employs

progressive disciplinary measures, which may include warnings, required coaching, fines, suspension, or termination of the salesforce member's account.

With respect to the specific claims identified by DSSRC in this matter, doTERRA stated that it promptly contacted the relevant salesforce members to address the posts. As a result of the Company's efforts, all 12 Facebook posts at issue were removed.

### **Administratively Resolved Resolution**

DSSRC recognized doTERRA's prompt and cooperative efforts to address the concerns raised in this inquiry. Rather than attempting to substantiate the earnings claims at issue, the Company elected to contact the salesforce members responsible for the Facebook posts and request that the content be removed or materially revised. As a result of these actions, all 12 posts identified by DSSRC were taken down. DSSRC determined that doTERRA's approach was both appropriate and responsive to the issues presented.

In its review, DSSRC observed that the earnings representations conveyed in the posts suggested that participants in the Company's business opportunity could reasonably expect to achieve significant or career-level income, including references to atypical monthly earnings figures and concepts such as "financial freedom" and "financial abundance." As reflected in the Federal Trade Commission's (FTC) *Business Guidance for Multi-Level Marketing*, income representations must accurately reflect the earnings that a typical participant is likely to achieve.<sup>3</sup> The FTC has cautioned that references to career-level income are not representative of the experience of most direct selling participants and, absent reliable substantiation, may mislead consumers.

Consistent with this guidance, DSSRC agreed that unqualified earnings or lifestyle claims that imply atypical income outcomes may create a deceptive impression regarding the nature of the business opportunity. Any participant who communicates an earnings claim must possess a reasonable basis for doing so, supported by reliable and empirical evidence demonstrating that the typical participant is likely to achieve results equal to or greater than those conveyed by the claim.

The DSSRC *Guidance on Earnings Claims for the Direct Selling Industry* ("the DSSRC Guidance") similarly advises against the use of language or imagery that suggests income levels beyond what an average participant can reasonably expect to earn. The DSSRC Guidance further identifies certain terms—such as "financial freedom"—as presenting heightened risk of consumer misunderstanding.<sup>4</sup>

In prior matters, DSSRC has concluded that aspirational income phrases, including references to "financial freedom," may create ambiguity for consumers when used without adequate qualification. Without appropriate context, such language may reasonably be interpreted as suggesting that participation in the opportunity will result in the elimination of financial concerns or achieving a significant, life-altering level of income.

In response to DSSRC's inquiry, doTERRA took corrective action by contacting the salesforce members responsible for the identified posts and requesting their removal. These efforts resulted in the elimination of all 12 social media posts at issue.

Based on the Company's actions and the complete removal of content identified in this inquiry, DSSRC administratively closed the inquiry.

### **Conclusion**

Given doTERRA's demonstrated good-faith efforts to resolve the issues raised, DSSRC determined that administrative closure of the inquiry was appropriate.

(Case No. 249, closed on 01/07/26)

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[1] This claim identified by DSSRC was disseminated in two separate Facebook posts in August 2024.

[2] doTERRA provided DSSRC with copies of its Earnings and Opportunity Guidelines and its Earnings Claim Guides.

[3] 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>.

[4] Direct Selling Self-Regulatory Council, Guidance on Earnings Claims for the Direct Selling Industry, Section 6(A) (2022).  
dssrc\_guidanceonearningsclaimsforthedirectsellingindustry.pdf

February 12, 2026

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