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# Case #161-2024: Monitoring Inquiry – inCruises International LLC

## BBB NATIONAL PROGRAMS

Direct Selling Self-Regulatory Council

Case #161-2024: Monitoring Inquiry – inCruises International LLC

## Company Description

inCruises International LLC (“inCruises” or the “Company”) is a Puerto Rico-based multi-level marketing company that sells vacation package memberships. These memberships focus on accumulating reward points that can then be used to purchase cruise packages through the inCruises website.

## 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 and marketing claims in the direct selling industry.

This inquiry concerns six earnings claims disseminated by the Company’s salesforce members. The representative claims that formed the basis for this inquiry are set forth below:

- “He always dreamed of building a lifestyle based on traveling and financial freedom. So, in 2017, a friend with whom he had worked before talked to him about the inCruises opportunity, and he immediately signed up as an inCruises Independent Partner. 😊 . . . These past 6 years, I’ve been able to travel more than ever before, visiting over 27 countries and sailing on over 12 cruises. I’ve built the lifestyle I always dreamed of and grown as a leader surrounded by inspiring professionals and friends from whom I learn every day.”
- “If you want to be a top leader, travel for free and have financial freedom, you are lucky to be part of our team, or if you need a change in your life, you have have an open invitation to become one !”
- “starting an online business needs low investment but provides you with location freedom and also financial freedom. . . . This allows us to be F R E E to enjoy life, participate in our social events and spend quality time with our loved ones. / It also allows you to save for retirement, secure your kids future and pass it to them later. WOW / People are joining everyday and taking this opportunity seriously because they wanna live life on their own terms and enjoy their lives while generating revenue.”
- “inCruises changed my life completely. I finally have the time and financial freedom I’ve always dreamed of. Through hard work, I was able to buy my first home, pay off debts, and help my family and friends do the same. I am eternally grateful.”
- “You can’t even imagine how many lives you are changing all over the world by giving them the opportunity to quit a routine job, or 2 jobs, or life without a time to live 🕒”
- “Have a life of financial freedom & time liberty to bask in your new-found wealth!”

### Company’s Position

inCruises promptly responded to DSSRC’s inquiry. The Company did not attempt to substantiate the earnings claims at issue in this inquiry.

Rather, the Company informed DSSRC that it contacted the individuals responsible for the social media posts and requested that they have the posts removed or modified to remove problematic language. This resulted in five of the six social media posts being properly modified or removed.

With respect to the remaining social media post, the Company notified DSSRC that the individual responsible for the posts had not been an active salesforce member for over a year. The Company further demonstrated to DSSRC that it made multiple attempts to contact this individual, including attempting to contact the former salesforce member through upline salesforce members. Despite these efforts, the individual was unresponsive to the Company’s takedown requests.

### Analysis and Recommendation

As noted above, the Company did not provide evidence to DSSRC to support the earnings claims at issue in this inquiry. As such, DSSRC determined that the actions taken by the Company to have five of the six claims at issue in this inquiry removed to be necessary and appropriate.

With respect to the one social media post that remains online, DSSRC acknowledged and appreciated the Company’s efforts to contact the former salesforce member to request removal of the post. Notwithstanding these efforts, DSSRC recommends that the Company attempt to contact the social media platform where the post was disseminated to inform the platform that the post includes inappropriate claims not authorized by the Company and request that the post be removed. As DSSRC noted in previous inquiries, if the social media platform where the subject post was made provides a mechanism for reporting trademark or copyright violations, DSSRC recommends that the direct selling company promptly utilize such mechanism and seek removal of the subject claims and posts. If the subject claim occurred on a website or platform without a reporting mechanism, DSSRC recommends that in addition to contacting the former distributor in writing (which the Company did here) the Company contact the website or platform in writing and request the removal of the subject claim or post.<sup>1</sup>

If efforts to utilize a mechanism for reporting trademark or copyright violations are unsuccessful or if the subject claim occurred on a website or platform without a reporting mechanism, DSSRC recommends that the Company contact the website or platform in writing and request removal of the subject claim or post.

### Conclusion

DSSRC determined that the actions taken by the Company to have five of the six social media claims at issue removed and/or modified to be necessary and appropriate.

With respect to the claim that is still publicly accessible, DSSRC also recommends that the Company attempt to contact the social media platform where the post was disseminated to inform it that the posts include inappropriate claims not authorized by the Company and request that the posts be removed.

### **Company Statement**

inGroup International has adopted a policy of being proactive, transparent and committed in its obligation to convey and expect high compliance standards for those who promote our Partnership opportunity wherever our business is conducted. Considering our global reach, we understand the importance of education, monitoring, and enforcement of our internal policies in order to ensure accountability and maintain a reputable presence in the industry.

We realize the essential need to maintain a high level of respect and constant collaboration with our internal Compliance Team, whose commitment to integrity and ongoing development persists to keep our company well-informed of industry regulatory changes. Which is why, when the DSSRC reached out to us, we immediately took the action of contacting the responsible Independent Partners to have the referenced infracting posts either removed or appropriately modified; and as a supplementary measure, we provide continual education to our Partners in the form of webinars, publications in addition to our guided notifications. With respect to the one post that remains, we will (and already have) comply with the DSSRC's recommendation that the post be reported to the social media platform where the post was disseminated to inform the platform that the post includes inappropriate claims not authorized by the Company and request that the post be removed. If necessary, we will contact the platform in writing and request removal of the subject post. We will provide the DSSRC with substantiation of these efforts.

We will continue to identify and develop tools to educate and enhance our sales force's compliance awareness, which is paramount to our culture.

(Case #161-2023, Closed on 04/24/24)

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[1] See Case #56-2022 Immunotec.

6.05.24

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