



UNITED STATES OF AMERICA
Federal Trade Commission
WASHINGTON, D.C. 20580

April 24, 2020
Via Electronic Mail

doTERRA International, LLC
c/o Mark A. Wolfert, General Counsel
389 South 1300 West
Pleasant Grove, Utah 84062

Warning Regarding Health and Earnings Claims Related to Coronavirus Disease 2019 (COVID-19)

Dear Mr. Wolfert,

FTC staff has reviewed social media posts made by doTERRA International, LLC (“doTERRA”) business opportunity participants or representatives that unlawfully advertise that certain products treat or prevent Coronavirus Disease 2019 (COVID-19) and misrepresent that consumers who become doTERRA business opportunity participants are likely to earn substantial income. This letter is to provide you with information about laws and regulations enforced by the Federal Trade Commission (“FTC”) that may bear upon your business activities, including the activities of your business opportunity participants and representatives.

Some examples of Coronavirus prevention or treatment claims made by your business opportunity participants or representatives include:

- “... If interested to learn more or obtain oils or rollers Let me know A little extra protection can help #doterra #NursesCOVID19 #Dialysis #ImmunityBoosters #ImproveRespiratoryFunction” The text accompanied an image titled “Grocery Store Clerks, Truck Drivers, Medical Responders, Teachers, Small Businesses, Mamas, and EVERYONE else” followed by a message composed of text and images of doTERRA-brand essential oil bottles.
- An image of doTERRA-brand peppermint and lemon essential oil bottles, accompanied by the hashtags “#covid #prevention.”
- “This is to inform us all that the pH for corona virus varies from 5.5 to 8.5.... All we need to do, to beat corona virus, we need to take more of an alkaline foods that are above the above pH level of the Virus. Some of which are: Lemon... Lime... Tangerine... Orange... #covid... #doterra #doterraph #doterraphillapines.” The text accompanied an image of lemon, lime, tangerine, wild orange, and ginger doTERRA-brand essential oil bottles.

Some examples of earnings claims made by your business opportunity participants or representatives include:

- “For those of you working from home now, who says you ever have to go back? With a little education and a lot of uplifting support... you can take your health and your career future into your own hands.”
- “Need to make extra money? Find it difficult to pay your bills? Were you laid off/#fired? Be your own Boss w/doTERRA essential oils. Msg me to achieve financial independence #laidoff #unemployed #cantpaymybills #cantpaymyrent #student #sales #sidehustle #makemoney #stayathomemom.”

It is unlawful under the FTC Act, 15 U.S.C. § 41 *et seq.*, to advertise that a product can prevent, treat, or cure human disease unless you possess competent and reliable scientific evidence, including, when appropriate, well-controlled human clinical studies, substantiating that the claims are true at the time they are made. For COVID-19, no such study is currently known to exist for the products identified above. Thus, any coronavirus-related prevention or treatment claims regarding such products are not supported by competent and reliable scientific evidence. You must immediately cease making all such claims.

Additionally, representations about a business opportunity, including earnings claims, violate Section 5 of the FTC Act, 15 U.S.C. § 41 *et seq.*, if they are false, misleading, or unsubstantiated and material to consumers. Express and implied earnings claims must be truthful and non-misleading to avoid being deceptive, which means that claims about the potential to achieve a wealthy lifestyle, career-level income, or significant income are false or misleading if business opportunity participants generally do not achieve such results. Even truthful testimonials from participants who do earn significant income or more will likely be misleading unless the advertising also makes clear the amount earned or lost by most participants. Your business opportunity participants and representatives must immediately cease making all express and implied earnings claims that would be false or misleading to current or prospective participants.

You are responsible for the claims of your business opportunity participants and representatives. As the FTC stated in the January 2019 [Business Guidance Concerning Multi-Level Marketing](#), the compensation structure of a Multi-Level Marketing entity (“MLM”) may create incentives for its participants to make certain representations to current or prospective participants. “As a consequence, an MLM should (i) direct its participants not to make false, misleading, or unsubstantiated representations and (ii) monitor its participants so they don’t make false, misleading, or unsubstantiated representations.”

You are advised to review all claims relating to your products and business opportunity and immediately cease, and require your business opportunity participants and representatives to cease, making claims that are not supported by the evidence or substantiation described above.

Within 48 hours, please send reply via email to COVID-19-Task-Force@ftc.gov describing the specific actions you have taken to address the FTC's concerns. If you have any questions regarding compliance with the FTC Act, please contact us at COVID-19-Task-Force@ftc.gov.

Sincerely,

Federal Trade Commission Staff



UNITED STATES OF AMERICA
Federal Trade Commission
WASHINGTON, D.C. 20580

April 24, 2020
Via Electronic Mail

Pruvit Ventures, Inc.
c/o David G. Upton, General Counsel
901 Sam Rayburn Highway
Melissa, Texas 75454

Warning Regarding Health and Earnings Claims Related to Coronavirus Disease 2019 (COVID-19)

Dear Mr. Upton,

FTC staff has reviewed social media posts made by Pruvit Ventures, Inc. (“Pruvit”) business opportunity participants or representatives that unlawfully advertise that certain products treat or prevent Coronavirus Disease 2019 (COVID-19) and misrepresent that consumers who become Pruvit business opportunity participants are likely to earn substantial income. This letter is to provide you with information about laws and regulations enforced by the Federal Trade Commission (“FTC”) that may bear upon your business activities, including the activities of your business opportunity participants and representatives.

Some examples of Coronavirus prevention or treatment claims made by your business opportunity participants or representatives include:

- “Got the coronavirus heebeegeebees? Boost your immunity with this amazing deal!!!!” The image accompanying the post shows Pruvit products beneath the phrase “Immunity Boost Pack.”
- “This breakdown of the coronavirus is really good!! . . . Some products you might currently be using for fat loss are also as a benefit helping your immunity . . . Signal OS enhances natural immune function . . .” The image accompanying the post shows Pruvit products beneath the phrase “Immunity Boost Pack.”
- “With all the concerns over the COVID-9 Coronavirus Instead of stockpiling toilet paper, you need to do something to help you fight the virus! Boost your immune system with our Immunity Boost Pack! Use intermittent fasting in conjunction with our ketones, signal OS caps, and MCT 143! Order while supplies last! #immunesupport #immunesystem #immuneboost #coronavirus #covid_19.” The image accompanying the post shows Pruvit products beneath the phrase “Immunity Boost Pack.”
- “I’m so excited for this!! It’s so important to keep your immune system up, but especially right now with the Coronavirus spreading rapidly. BETTER health is TØP priority! Introducing our Immunity BOOST Pack, full of technology to

support you this season.” The image accompanying the post shows Pruvit products beneath the phrase “Immunity Boost Pack.”

- “Protocol for Study of Virgin Coconut Oil and COVID-19 (I have oil in stock if anyone needs some) Virgin coconut oil contains 60% lauric and capric fatty acids, which are well known to kill many viruses and are used as such in sprays, wipes, oral and skin care products. Here is a protocol with rationale and how-to-use guidelines to supplement treatment for people with COVID-19 infection and another guide for people to prevent it. Developed by MDs, PhDs at Ateneo University in the Philippines (with my input) and going under study at hospitals there. Direct lab testing of the virus is also underway.”

Some examples of earnings claims made by your business opportunity participants or representatives include:

- A video titled “How to make money from home with the new Pruvit promo,” with the statement: “I can tell you that there’s thousands of people that are out of work right now. They’re all looking for a way to go earn money. This is a great stimulus package, because you get to teach somebody how to go earn \$1,730 literally in their first 10 days in the business.”
- A video titled “THRIVING IN THIS NEW ECONOMY // HOW TO BUILD A PRUVIT BUSINESS FROM A TOP INCOME EARNER,” with the description “with these uncertain times, one thing we know for sure is that fortune favors the bold. People have nothing but TIME right now to level up and get better, to pivot and overcome or fall behind even more. Which way are you heading? In light of what’s going on in the entire world right now....” with the statements: “[I]’ve also been able to create a very lucrative business that helps me literally live life on my terms. I live in a beautiful house in Nevada by myself. It’s a million-dollar house. I’m driving a Tesla. . . . I have—debt free. . . . In light of what’s going on, we want more people to jump in on this opportunity and to make money in this uncertain time, but also, realize that this is the future. Having skills to build an online business is not a bonus. At this point, it’s a necessity. . . . There’s more job security online than there is in brick and mortars. . . . [5:55] [O]ne dollar. That’s all it takes to just start this business, which can potentially make you 3, 4, 5, 6, 7 figures a year. . . . Imagine financial freedom. Whatever that looks like to you, it is here. You’re fully able to access that and tap into that.”

It is unlawful under the FTC Act, 15 U.S.C. § 41 *et seq.*, to advertise that a product can prevent, treat, or cure human disease unless you possess competent and reliable scientific evidence, including, when appropriate, well-controlled human clinical studies, substantiating that the claims are true at the time they are made. For COVID-19, no such study is currently known to exist for the products identified above. Thus, any coronavirus-related prevention or treatment claims regarding such products are not supported by competent and reliable scientific evidence. You must immediately cease making all such claims.

Additionally, representations about a business opportunity, including earnings claims, violate Section 5 of the FTC Act, 15 U.S.C. § 41 *et seq.*, if they are false, misleading, or

unsubstantiated and material to consumers. Express and implied earnings claims must be truthful and non-misleading to avoid being deceptive, which means that claims about the potential to achieve a wealthy lifestyle, career-level income, or significant income are false or misleading if business opportunity participants generally do not achieve such results. Even truthful testimonials from participants who do earn significant income or more will likely be misleading unless the advertising also makes clear the amount earned or lost by most participants. Your business opportunity participants and representatives must immediately cease making all express and implied earnings claims that would be false or misleading to current or prospective participants.

You are responsible for the claims of your business opportunity participants and representatives. As the FTC stated in the January 2019 [Business Guidance Concerning Multi-Level Marketing](#), the compensation structure of a Multi-Level Marketing entity (“MLM”) may create incentives for its participants to make certain representations to current or prospective participants. “As a consequence, an MLM should (i) direct its participants not to make false, misleading, or unsubstantiated representations and (ii) monitor its participants so they don’t make false, misleading, or unsubstantiated representations.”

You are advised to review all claims relating to your products and business opportunity and immediately cease, and require your business opportunity participants and representatives to cease, making claims that are not supported by the evidence or substantiation described above.

Within 48 hours, please send reply via email to COVID-19-Task-Force@ftc.gov describing the specific actions you have taken to address the FTC’s concerns. If you have any questions regarding compliance with the FTC Act, please contact us at COVID-19-Task-Force@ftc.gov.

Sincerely,

Federal Trade Commission Staff



UNITED STATES OF AMERICA
Federal Trade Commission
WASHINGTON, D.C. 20580

April 24, 2020
Via Electronic Mail

Total Life Changes, LLC
c/o Ron Rose, Director of Legal and Compliance
6095 Corporate Dr.
Fair Haven, Michigan 48023

Warning Regarding Health and Earnings Claims Related to Coronavirus Disease 2019 (COVID-19)

Dear Mr. Rose,

FTC staff has reviewed social media posts made by Total Life Changes, LLC (“Total Life Changes”) business opportunity participants or representatives that unlawfully advertise that certain products treat or prevent Coronavirus Disease 2019 (COVID-19) and misrepresent that consumers who become Total Life Changes business opportunity participants are likely to earn substantial income. This letter is to provide you with information about laws and regulations enforced by the Federal Trade Commission (“FTC”) that may bear upon your business activities, including the activities of your business opportunity participants and representatives.

Some examples of Coronavirus prevention or treatment claims made by your business opportunity participants or representatives include:

- “Have you had your vitamins today! Did your kids have their vitamins? Did you get your daily dose of Fruits and vegetables? HOW WILL YOU FIGHT OFF CORONA? USE NUTRABURST-CHAGA- #coronacure #coronaprevention ... #immunesupport #immunebooster ... #immunesystembooster”
- “Yesss Protect Your Immune System... #nutraburst #coronavirusfighter ... #immunesystembooster.” The text accompanied the image of a product with a surgical mask and a caption reading, “PROTECT YOURSELF. GIVE YOUR IMMUNE SYSTEM THE BOOST IT NEEDS.”
- “BOOST UP YOUR IMMUNE SYSTEM!!! Don’t get caught out there and #Corona grab a hold of you.” Text accompanied an image of four bottles of Nutra Burst.
- “Worried about vulnerability to the Coronavirus? Why not boost your immune system with a shot of #NutraBurstLiquidVitamins. Ol’ time people seh... “beta to be safe dan sorry.” Text accompanied an image of a bottle of Nutra Burst.
- “Stay COVID-19 Free# Nutraburst clicklinkinbio”

Some examples of earnings claims made by your business opportunity participants or representatives include:

- A video titled “MAKE MONEY DURING THE QUARANTINE WITH TOTAL LIFE CHANGES,” with the statement “I’m providing y’all with the opportunity to make money from home, as I am. I’m providing y’all with the opportunity to make an extra 100 to 500 dollars a week. Ok?” accompanied by the text “EXTRA 100-\$500 A WEEK” over the image in the video.
- A video in which the narrator, describing a social media post by a team member who previously worked as a DJ, states “We’re in the middle of Corona and... there’s no parties there’s no events so he has nothing to DJ. So [the DJ] says... ‘I’m out of work for seven days and its day one. And I made \$200 in just one day! If you’re a go getter and ready to invest in yourself and start your at home business ask me how now...’ He’s been in the business a very short period of time and look, today alone he made \$200!” The narrator, describing a second team member’s social media post, “She made \$100 yesterday just by following the plan.”
- “You call up family and friends and you say, ‘Hey look. I’ve got this business... I need you guys to come on in here and do this, because we’re laid off, we’re quarantined, we can’t go anywhere, we might as well make some money online!’ ... 50 people, \$20 per product sold. That’s \$1,000. Ok?... Don’t you want to do that? When you sitting around and not making anything? This is some good money. Very good money... That is your immune system boosting food that everyone needs right now, because of this COVID-19... Why not do this? Because you’re either going to sit at home quarantined and do nothing or you’re going to sit at home quarantined and get on that phone or your laptop or whatever you got at home to be online with and make you some money. I would think that’s a pretty good deal, especially when you getting that quick fast money such as TLC is paying you. And that’s not including the other three [ways to make money in TLC], I just showed you the main two.”

It is unlawful under the FTC Act, 15 U.S.C. § 41 *et seq.*, to advertise that a product can prevent, treat, or cure human disease unless you possess competent and reliable scientific evidence, including, when appropriate, well-controlled human clinical studies, substantiating that the claims are true at the time they are made. For COVID-19, no such study is currently known to exist for the products identified above. Thus, any coronavirus-related prevention or treatment claims regarding such products are not supported by competent and reliable scientific evidence. You must immediately cease making all such claims.

Additionally, representations about a business opportunity, including earnings claims, violate Section 5 of the FTC Act, 15 U.S.C. § 41 *et seq.*, if they are false, misleading, or unsubstantiated and material to consumers. Express and implied earnings claims must be truthful and non-misleading to avoid being deceptive, which means that claims about the potential to achieve a wealthy lifestyle, career-level income, or significant income are false or misleading if business opportunity participants generally do not achieve such results. Even truthful testimonials from participants who do earn significant income or more will likely be misleading

unless the advertising also makes clear the amount earned or lost by most participants. Your business opportunity participants and representatives must immediately cease making all express and implied earnings claims that would be false or misleading to current or prospective participants.

You are responsible for the claims of your business opportunity participants and representatives. As the FTC stated in the January 2019 [Business Guidance Concerning Multi-Level Marketing](#), the compensation structure of a Multi-Level Marketing entity (“MLM”) may create incentives for its participants to make certain representations to current or prospective participants. “As a consequence, an MLM should (i) direct its participants not to make false, misleading, or unsubstantiated representations and (ii) monitor its participants so they don’t make false, misleading, or unsubstantiated representations.”

You are advised to review all claims relating to your products and business opportunity and immediately cease, and require your business opportunity participants and representatives to cease, making claims that are not supported by the evidence or substantiation described above.

Within 48 hours, please send reply via email to COVID-19-Task-Force@ftc.gov describing the specific actions you have taken to address the FTC’s concerns. If you have any questions regarding compliance with the FTC Act, please contact us at COVID-19-Task-Force@ftc.gov.

Sincerely,

Federal Trade Commission Staff



UNITED STATES OF AMERICA
Federal Trade Commission
WASHINGTON, D.C. 20580

April 24, 2020
Via Electronic Mail

Tranont
c/o Lorne Berry, CEO
3451 N. Triumph Blvd.
Garden Level
Lehi, Utah 84043

Warning Regarding Health and Earnings Claims Related to Coronavirus Disease 2019 (COVID-19)

Dear Mr. Berry,

FTC staff has reviewed social media posts made by Tranont business opportunity participants or representatives that unlawfully advertise that certain products treat or prevent Coronavirus Disease 2019 (COVID-19) and misrepresent that consumers who become Tranont business opportunity participants are likely to earn substantial income. This letter is to provide you with information about laws and regulations enforced by the Federal Trade Commission ("FTC") that may bear upon your business activities, including the activities of your business opportunity participants and representatives.

Some examples of Coronavirus prevention or treatment claims made by your business opportunity participants or representatives include:

- "You'll need a strong immune system to fight Coronavirus. Get great plant based supplements to help support your immune system and the systems of your family members."
- "Fight the Corona virus by building up your immune system. NEW products available now."
- "Fight corona virus with beneficial Nitric Oxide (NO) in your body with L-arginine AAKG and plant based compounds that produce and protect Nitrix Oxide production."
- "NEW PRODUCT. TECHNO BOOST can help you fight Coronavirus. Order yours today."
- "Did you know the Coronavirus is a nucleoprotein and other viruses are made up of viral proteins? Well I have Restore, Restore is a proteolytic enzyme which breaks down proteins. Get yourself some Restore to help you break down the proteins in your body."

Some examples of earnings claims made by your business opportunity participants or representatives include:

- “Maybe some of us have lost our jobs or are trying to figure out how we’re paying for childcare now. . . . What I’m going to share with you is something that . . . even with the crazy economy, you can build something massive.” [38 minutes later] “Whether you want to make an extra \$600 a month, an extra \$10,000 a month, or you want to make over \$1 million a year, you can do that...” [5 minutes later] “The economy is a little bit unstable right now. . . . This is a way for you to have a plan B—for you to take control of whatever it is that you’re looking for. Maybe it’s to retire. Maybe it’s to get out of debt. Maybe it’s to pay for college You have an opportunity to take advantage of something massive and help people give gifts to everybody that you know: a health gift and financial freedom.”

It is unlawful under the FTC Act, 15 U.S.C. § 41 *et seq.*, to advertise that a product can prevent, treat, or cure human disease unless you possess competent and reliable scientific evidence, including, when appropriate, well-controlled human clinical studies, substantiating that the claims are true at the time they are made. For COVID-19, no such study is currently known to exist for the products identified above. Thus, any coronavirus-related prevention or treatment claims regarding such products are not supported by competent and reliable scientific evidence. You must immediately cease making all such claims.

Additionally, representations about a business opportunity, including earnings claims, violate Section 5 of the FTC Act, 15 U.S.C. § 41 *et seq.*, if they are false, misleading, or unsubstantiated and material to consumers. Express and implied earnings claims must be truthful and non-misleading to avoid being deceptive, which means that claims about the potential to achieve a wealthy lifestyle, career-level income, or significant income are false or misleading if business opportunity participants generally do not achieve such results. Even truthful testimonials from participants who do earn significant income or more will likely be misleading unless the advertising also makes clear the amount earned or lost by most participants. Your business opportunity participants and representatives must immediately cease making all express and implied earnings claims that would be false or misleading to current or prospective participants.

You are responsible for the claims of your business opportunity participants and representatives. As the FTC stated in the January 2019 [Business Guidance Concerning Multi-Level Marketing](#), the compensation structure of a Multi-Level Marketing entity (“MLM”) may create incentives for its participants to make certain representations to current or prospective participants. “As a consequence, an MLM should (i) direct its participants not to make false, misleading, or unsubstantiated representations and (ii) monitor its participants so they don’t make false, misleading, or unsubstantiated representations.”

You are advised to review all claims relating to your products and business opportunity and immediately cease, and require your business opportunity participants and representatives to cease, making claims that are not supported by the evidence or substantiation described above.

Within 48 hours, please send reply via email to COVID-19-Task-Force@ftc.gov describing the specific actions you have taken to address the FTC's concerns. If you have any questions regarding compliance with the FTC Act, please contact us at COVID-19-Task-Force@ftc.gov.

Sincerely,

Federal Trade Commission Staff



UNITED STATES OF AMERICA
Federal Trade Commission
WASHINGTON, D.C. 20580

April 24, 2020
Via Electronic Mail

Modere, Inc.
c/o Michelle Wilson, General Counsel
588 S 2000 W
Springville, Utah 84663

Warning Regarding Health and Earnings Claims Related to Coronavirus Disease 2019 (COVID-19)

Dear Ms. Wilson,

FTC staff has reviewed social media posts made by Modere, Inc. (“Modere”) business opportunity participants or representatives that unlawfully advertise that certain products treat or prevent Coronavirus Disease 2019 (COVID-19) and misrepresent that consumers who become Modere business opportunity participants are likely to earn substantial income. This letter is to provide you with information about laws and regulations enforced by the Federal Trade Commission (“FTC”) that may bear upon your business activities, including the activities of your business opportunity participants and representatives.

Some examples of Coronavirus prevention or treatment claims made by your business opportunity participants or representatives include:

- “STAY SAFE!! MAKE YOUR IMMUNE SYSTEM STRONG!!! Standard coronavirus protection kit . #antiseptics and #immunity_support.”
- “In the midst of all this corona virus hype, we should all be focused on IMMUNE HEALTH Guys forget about toilet paper!!!! This is WHAT YOU NEED!!!! I’ve had a few people ask me this week what products do we sell that helps protect them and their families... THE MODERE SOLUTION... this powerful formula will assist the immune and respiratory systems in the defence [sic] against everyday attacks. Immune Health can also promote recovery during periods of illness, and, when taken regularly, it may help to boost the response time of the immune system allowing it to effectively maintain health and wellness.”

Some examples of earnings claims made by your business opportunity participants or representatives include:

- A video with the description “... We have been so blessed as 7-figure earners and we are here to help you, achieve your financial or time freedom goals,” and the statements” “The timing for you to get involved with an online business is second to none guys. . . . In the United States alone, 3.3 million people filed for

unemployment last week alone. So guess what? They're looking to make an extra \$200, \$300, \$400, \$500 right part time right now. . . . You have the ability to make money right away. . . . There are so many people right now that are looking for something. That will be looking for something. . . . We give them an opportunity to really have a better quality of life, however they want to define it. Whether it be an extra 50 bucks, an extra 500 bucks, an extra 5,000 bucks—they get to choose the quality of life that they want here at Modere.”

- “I have a [question] for you as we move forward in this NEW economy – have you decided what your financial safety net or back up plan will be? . . . Connect with me to talk about earning \$500-\$1500 a month from home.”

It is unlawful under the FTC Act, 15 U.S.C. § 41 *et seq.*, to advertise that a product can prevent, treat, or cure human disease unless you possess competent and reliable scientific evidence, including, when appropriate, well-controlled human clinical studies, substantiating that the claims are true at the time they are made. For COVID-19, no such study is currently known to exist for the products identified above. Thus, any coronavirus-related prevention or treatment claims regarding such products are not supported by competent and reliable scientific evidence. You must immediately cease making all such claims.

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You are responsible for the claims of your business opportunity participants and representatives. As the FTC stated in the January 2019 [Business Guidance Concerning Multi-Level Marketing](#), the compensation structure of a Multi-Level Marketing entity (“MLM”) may create incentives for its participants to make certain representations to current or prospective participants. “As a consequence, an MLM should (i) direct its participants not to make false, misleading, or unsubstantiated representations and (ii) monitor its participants so they don’t make false, misleading, or unsubstantiated representations.”

You are advised to review all claims relating to your products and business opportunity and immediately cease, and require your business opportunity participants and representatives to cease, making claims that are not supported by the evidence or substantiation described above.

Within 48 hours, please send reply via email to COVID-19-Task-Force@ftc.gov describing the specific actions you have taken to address the FTC's concerns. If you have any questions regarding compliance with the FTC Act, please contact us at COVID-19-Task-Force@ftc.gov.

Sincerely,

Federal Trade Commission Staff



UNITED STATES OF AMERICA
Federal Trade Commission
WASHINGTON, D.C. 20580

April 24, 2020
Via Electronic Mail

Arbonne International, LLC
c/o Bernadette Chala, Chief Legal Officer
& General Counsel
9400 Jeronimo Rd.
Irvine, CA 92618

Warning Regarding Health and Earnings Claims Related to Coronavirus Disease 2019 (COVID-19)

Dear Ms. Chala:

Federal Trade Commission (“FTC”) staff has reviewed social media posts made by Arbonne International, LLC, (“Arbonne”) business opportunity participants or representatives that unlawfully advertise that certain products treat or prevent Coronavirus Disease 2019 (“COVID-19”) and misrepresent that consumers who become Arbonne business opportunity participants are likely to earn substantial income. This letter is to provide you with information about laws and regulations enforced by the FTC that may bear upon your business activities, including the activities of your business opportunity participants and representatives.

Some examples of COVID-19 prevention or treatment claims made by your business opportunity participants or representatives include:

- “I’ll be going live on my #IGTV in a couple of hours talking about a product which we’ve got over at #Arbonne called ‘Immunity Support’. Drop me a message if you’re interested in finding out more & how you can boost up your immune system right now. #CoronaVirus #ImmuneSystem”

Some examples of earnings claims made by your business opportunity participants or representatives include:

- “...Living in quarantine and where 14 million people applied for unemployment just last week ... I’ll stick with the opportunity to change people’s lives ... turn a small investment into six figures #arbonne ... #quarantine #2020”
- “We have been thrown into the massive economic collapse in the past 13 years. ... Arbonne is a legitimate business, that rewards you for your hard work. In a little over one year, my wife [] is about 6 months away from replacing her income from working 40 hours/week [at a] local college. In addition, the possibilities are endless, I have met those who make \$22,000/month as national vice presidents.

Has this shutdown given you the ability to make a small investment into a big future and let you own your own business?"

It is unlawful under the FTC Act, 15 U.S.C. § 41 *et seq.*, to advertise that a product can prevent, treat, or cure human disease unless you possess competent and reliable scientific evidence, including, when appropriate, well-controlled human clinical studies, substantiating that the claims are true at the time they are made. For COVID-19, no such study is currently known to exist for the products identified above. Thus, any coronavirus-related prevention or treatment claims regarding such products are not supported by competent and reliable scientific evidence. You must immediately cease making all such claims.

Additionally, representations about a business opportunity, including earnings claims, violate Section 5 of the FTC Act, 15 U.S.C. § 41 *et seq.*, if they are false, misleading, or unsubstantiated and material to consumers. Express and implied earnings claims must be truthful and non-misleading to avoid being deceptive, which means that claims about the potential to achieve a wealthy lifestyle, career-level income, or significant income are false or misleading if business opportunity participants generally do not achieve such results. Even truthful testimonials from participants who do earn significant income or more will likely be misleading unless the advertising also makes clear the amount earned or lost by most participants. Your business opportunity participants and representatives must immediately cease making all express and implied earnings claims that would be false or misleading to current or prospective participants.

You are responsible for the claims of your business opportunity participants and representatives. As the FTC stated in the January 2019 [Business Guidance Concerning Multi-Level Marketing](#), the compensation structure of a Multi-Level Marketing entity ("MLM") may create incentives for its participants to make certain representations to current or prospective participants. "As a consequence, an MLM should (i) direct its participants not to make false, misleading, or unsubstantiated representations and (ii) monitor its participants so they don't make false, misleading, or unsubstantiated representations."

You are advised to review all claims relating to your products and business opportunity and immediately cease, and require your business opportunity participants and representatives to cease, making claims that are not supported by the evidence or substantiation described above.

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Sincerely,

Federal Trade Commission Staff



UNITED STATES OF AMERICA
Federal Trade Commission
WASHINGTON, D.C. 20580

April 24, 2020
Via Electronic Mail

IDLife, LLC
c/o Mark Bennett, COO, General Counsel
10825 John W. Elliot Dr. #100
Frisco, Texas 75033

**Warning Regarding Earnings Claims Related to Coronavirus
Disease 2019 (COVID-19)**

Dear Mr. Bennett,

FTC staff has reviewed social media posts made by IDLife, LLC (“IDLife”) business opportunity participants or representatives that unlawfully misrepresent that consumers who become IDLife business opportunity participants are likely to earn substantial income. This letter is to provide you with information about laws and regulations enforced by the Federal Trade Commission (“FTC”) that may bear upon your business activities, including the activities of your business opportunity participants and representatives.

Some examples of earnings claims made by your business opportunity participants or representatives include:

- “Stimulus check=\$1200 I used to think thats alot of money but now I know ways that amount can be made rather quickly.” Statement made on the social media page of person who lists their work as “IDLife Corporate National Presidential Director.”
- In a video titled “What did [] & [] do when she lost her job in May and how could this help you now with what is going on?”, the statements: “I love going to bed at night and waking up in the morning to see I’ve earned more income when I was sleeping than when I was awake....” [nine minutes later] “Is it gonna help you rebuild that savings . . . that three month, six month savings that you’re depleting right now?”

Representations about a business opportunity, including earnings claims, violate Section 5 of the FTC Act, 15 U.S.C. § 41 *et seq.*, if they are false, misleading, or unsubstantiated and material to consumers. Express and implied earnings claims must be truthful and non-misleading to avoid being deceptive, which means that claims about the potential to achieve a wealthy lifestyle, career-level income, or significant income are false or misleading if business opportunity participants generally do not achieve such results. Even truthful testimonials from participants who do earn significant income or more will likely be misleading unless the advertising also makes clear the amount earned or lost by most participants. Your business

opportunity participants and representatives must immediately cease making all express and implied earnings claims that would be false or misleading to current or prospective participants.

You are responsible for the claims of your business opportunity participants and representatives. As the FTC stated in the January 2019 [Business Guidance Concerning Multi-Level Marketing](#), the compensation structure of a Multi-Level Marketing entity (“MLM”) may create incentives for its participants to make certain representations to current or prospective participants. “As a consequence, an MLM should (i) direct its participants not to make false, misleading, or unsubstantiated representations and (ii) monitor its participants so they don’t make false, misleading, or unsubstantiated representations.”

You are advised to review all claims relating to your business opportunity and immediately cease, and require your business opportunity participants and representatives to cease, making claims that are not supported by the evidence or substantiation described above.

Within 48 hours, please send reply via email to COVID-19-Task-Force@ftc.gov describing the specific actions you have taken to address the FTC’s concerns. If you have any questions regarding compliance with the FTC Act, please contact us at COVID-19-Task-Force@ftc.gov.

Sincerely,

Federal Trade Commission Staff



UNITED STATES OF AMERICA
Federal Trade Commission
WASHINGTON, D.C. 20580

April 24, 2020
Via Electronic Mail

It Works Marketing, Inc.
c/o Timothy M. Seat, General Counsel
908 Riverside Drive
Palmetto, Florida 34221

**Warning Regarding Earnings Claims Related to Coronavirus
Disease 2019 (COVID-19)**

Dear Mr. Seat,

FTC staff has reviewed social media posts made by It Works Marketing, Inc. (“It Works!”), on your social media website at <https://www.facebook.com/TheOfficialItWorks/>, and by It Works! business opportunity participants or representatives that unlawfully misrepresent that consumers who become It Works! business opportunity participants are likely to earn substantial income. This letter is to provide you with information about laws and regulations enforced by the Federal Trade Commission (“FTC”) that may bear upon your business activities, including the activities of your business opportunity participants and representatives.

Some examples of earnings claims made on your corporate social media website include:

- A video with the description “... Because of It Works!, her family’s income isn’t impacted by COVID-19. Learn how you can start working from home and earning \$500 a month!,” and the statement: “[E]veryone’s getting stimulus checks right now.... There is no better investment you could do.... Take that money that you’re about to get back... figure out a way to make this happen tonight.”
- A video with the description “Tune in LIVE to learn how to build a business and earn an extra \$500 a month—all from the comfort of your couch!....,” and the statements: “She joined this business...and decided to go for it and so January, February, March . . . she decided to go for it and . . . earned herself that \$15,000 bonus. . . . That’s life change right there, and it’s possible. . . . In my organization in the business, we had 70 promotions in March. . . . March 2020—a month that people . . . had a lot of uncertainty. We had people promote and move up in the ranks.” A second person responds, “You guys, that could be you. If you’re watching right now, that could be you.... There’s a whole gamut of options for you guys, but there’s also, like, the sky is the limit. . . . Can you imagine if you can take your family on dream vacations? . . . People are doing it. Why not you?”

Some examples of earnings claims made by your business opportunity participants or representatives include:

- “During the recession in 2008, my company went debt free. Right now during these hard times, my company is KILLING it. Why? Because people want to work from home. People see why this is such an amazing plan B.... Within 6 months I was making more than I was making at my government job! At the age of 29, I will become a millionaire all from my social media! At 23 I have been a top enroller top leader At 25 I will be a top income earner! And within all these years, I have paid every bill with this business, every trip/ vacation has been paid in cash ALL WHILE GIVING BACK!!.... So if you are struggling and need MORE, this is your chance.”
- “So much uncertainty in the world right now but our team is NOT struggling. We are having the biggest month EVER and it’s only the 4th! sooooo many people changing their LIFE right now and are pushing to earn a \$15,000 and \$20,000 bonuses! Working from home has never been such a blessing. Does anyone else need an income working from home right now?!”
- “I was going to ask who wants to earn \$500 from their phone but skrew that! Who wants to learn how to make a \$15,000 bonus?! #gobig #andstayhome In such an unsure time I’ve been able to already help 2 girls on my team promote and double promote! Right now I’m charting 3 of them for their own \$15,000 bonuses!... And I can help you do the same if you’re hard working and serious about this!... Ya girls about to hit a \$20,000 bonus When are you going to stop watching and wondering if this is real?”

Representations about a business opportunity, including earnings claims, violate Section 5 of the FTC Act, 15 U.S.C. § 41 *et seq.*, if they are false, misleading, or unsubstantiated and material to consumers. Express and implied earnings claims must be truthful and non-misleading to avoid being deceptive, which means that claims about the potential to achieve a wealthy lifestyle, career-level income, or significant income are false or misleading if business opportunity participants generally do not achieve such results. Even truthful testimonials from or about participants who do earn significant income or more will likely be misleading unless the advertising also makes clear the amount earned or lost by most participants. It Works! and your business opportunity participants and representatives must immediately cease making all express and implied earnings claims that would be false or misleading to current or prospective participants.

You are responsible for the claims of your business opportunity participants and representatives. As the FTC stated in the January 2019 [Business Guidance Concerning Multi-Level Marketing](#), the compensation structure of a Multi-Level Marketing entity (“MLM”) may create incentives for its participants to make certain representations to current or prospective participants. “As a consequence, an MLM should (i) direct its participants not to make false, misleading, or unsubstantiated representations and (ii) monitor its participants so they don’t make false, misleading, or unsubstantiated representations.”

You are advised to review all claims relating to your business opportunity and immediately cease, and require your business opportunity participants and representatives to cease, making claims that are not supported by the evidence or substantiation described above.

Within 48 hours, please send reply via email to COVID-19-Task-Force@ftc.gov describing the specific actions you have taken to address the FTC's concerns. If you have any questions regarding compliance with the FTC Act, please contact us at COVID-19-Task-Force@ftc.gov.

Sincerely,

Federal Trade Commission Staff



UNITED STATES OF AMERICA
Federal Trade Commission
WASHINGTON, D.C. 20580

April 24, 2020
Via Electronic Mail

Rodan & Fields, LLC
c/o Jennifer Chaloeontiarana, Chief Legal Officer
60 Spear Street, Suite 600
San Francisco, California 94105

**Warning Regarding Earnings Claims Related to Coronavirus
Disease 2019 (COVID-19)**

Dear Ms. Chaloeontiarana,

FTC staff has reviewed social media posts made by Rodan & Fields, LLC (“Rodan + Fields”) business opportunity participants or representatives that unlawfully misrepresent that consumers who become Rodan + Fields business opportunity participants are likely to earn substantial income. This letter is to provide you with information about laws and regulations enforced by the Federal Trade Commission (“FTC”) that may bear upon your business activities, including the activities of your business opportunity participants and representatives.

Some examples of earnings claims made by your business opportunity participants or representatives include:

- “RODAN and FIELDS is always open for business even during quarantine! I’ve been working from home for over 3 years now and still making money when other people aren’t ! Isn’t it about time you found out what it is I do and how this company really works ? . . . #workfromhome #financialfreedom.”
- “We all need something to fall back on when our Plan A crumbles. For many, many people right now, the Plan A is no longer providing. Given that we are all at home trying to manage this new normal ... Let’s chat and get all your questions answered and start getting that Plan B up and running ... bringing in that EXTRA INCOME! . . . #extraincome . . . #financialfreedom.” The text accompanied an image with the text “no risk,” “no experience needed,” and “can be profitable immediately.”
- “During an uncertain time like this, one thing I am grateful for is residual income from my home based business. If you’re struggling, and could use an extra few hundred dollars a month, why not give this a try.... #residualincome.” The image accompanying the post states, “I have spots available on my team!!! If you want to make an extra \$200, \$500, or \$1,000 a month, message me!”

Representations about a business opportunity, including earnings claims, violate Section 5 of the FTC Act, 15 U.S.C. § 41 *et seq.*, if they are false, misleading, or unsubstantiated and

material to consumers. Express and implied earnings claims must be truthful and non-misleading to avoid being deceptive, which means that claims about the potential to achieve a wealthy lifestyle, career-level income, or significant income are false or misleading if business opportunity participants generally do not achieve such results. Even truthful testimonials from participants who do earn significant income or more will likely be misleading unless the advertising also makes clear the amount earned or lost by most participants. Your business opportunity participants and representatives must immediately cease making all express and implied earnings claims that would be false or misleading to current or prospective participants.

You are responsible for the claims of your business opportunity participants and representatives. As the FTC stated in the January 2019 [Business Guidance Concerning Multi-Level Marketing](#), the compensation structure of a Multi-Level Marketing entity (“MLM”) may create incentives for its participants to make certain representations to current or prospective participants. “As a consequence, an MLM should (i) direct its participants not to make false, misleading, or unsubstantiated representations and (ii) monitor its participants so they don’t make false, misleading, or unsubstantiated representations.”

You are advised to review all claims relating to your business opportunity and immediately cease, and require your business opportunity participants and representatives to cease, making claims that are not supported by the evidence or substantiation described above.

Within 48 hours, please send reply via email to COVID-19-Task-Force@ftc.gov describing the specific actions you have taken to address the FTC’s concerns. If you have any questions regarding compliance with the FTC Act, please contact us at COVID-19-Task-Force@ftc.gov.

Sincerely,

Federal Trade Commission Staff



UNITED STATES OF AMERICA
Federal Trade Commission
WASHINGTON, D.C. 20580

April 24, 2020
Via Electronic Mail

Zurvita, Inc.
c/o Jay Shafer and Mark Jarvis, CEOs
840 West Sam Houston Parkway North
Suite 300
Houston, Texas 77024

**Warning Regarding Health Claims Related to Coronavirus
Disease 2019 (COVID-19)**

Dear Mr. Shafer and Mr. Jarvis,

FTC staff has reviewed social media posts made by Zurvita, Inc. (“Zurvita”) business opportunity participants or representatives that unlawfully advertise that certain products treat or prevent Coronavirus Disease 2019 (COVID-19). This letter is to provide you with information about laws and regulations enforced by the Federal Trade Commission (“FTC”) that may bear upon your business activities, including the activities of your business opportunity participants and representatives.

Some examples of Coronavirus prevention or treatment claims made by your business opportunity participants or representatives include:

- “Want to join me in drinking Zeal to combat the Corona Virus? Contact me . . . to learn how to be your own Corona Virus Super Hero!”
- “Our immune system is constantly evolving and it’s super advanced yet, from time to time, it meets a new enemy that it has to learn to fight. That is the case with the COVID-19 pandemic. A lot of us are worried about getting the virus and since a vaccine has yet to be developed we’re going to have to rely on our good-old immune system to keep us healthy. In addition to a good diet, lots of water and regular exercise, one of the best ways to STRENGTHEN YOUR IMMUNE SYSTEM is to take the best broad-spectrum nutritional supplement you can find. I can’t find anything better than Zeal! It’s packed with immune supporting nutrients like Vitamins, Minerals, Whole Food Concentrates, Super Foods, Adaptogens, Herbs, Phytonutrients, Antioxidants and Anti-inflammatories.” The text accompanied an illustration of Coronavirus next to text reading “you can strengthen your immune system.”

It is unlawful under the FTC Act, 15 U.S.C. § 41 *et seq.*, to advertise that a product can prevent, treat, or cure human disease unless you possess competent and reliable scientific

evidence, including, when appropriate, well-controlled human clinical studies, substantiating that the claims are true at the time they are made. For COVID-19, no such study is currently known to exist for the product(s) identified above. Thus, any coronavirus-related prevention or treatment claims regarding such product(s) are not supported by competent and reliable scientific evidence. You must immediately cease making all such claims.

You are responsible for the claims of your business opportunity participants and representatives. As the FTC stated in the January 2019 [Business Guidance Concerning Multi-Level Marketing](#), the compensation structure of a Multi-Level Marketing entity (“MLM”) may create incentives for its participants to make certain representations to current or prospective participants. “As a consequence, an MLM should (i) direct its participants not to make false, misleading, or unsubstantiated representations and (ii) monitor its participants so they don’t make false, misleading, or unsubstantiated representations.”

You are advised to review all claims relating to your products and immediately cease, and require your business opportunity participants and representatives to cease, making claims that are not supported by the evidence or substantiation described above.

Within 48 hours, please send reply via email to COVID-19-Task-Force@ftc.gov describing the specific actions you have taken to address the FTC’s concerns. If you have any questions regarding compliance with the FTC Act, please contact us at COVID-19-Task-Force@ftc.gov.

Sincerely,

Federal Trade Commission Staff



UNITED STATES OF AMERICA
Federal Trade Commission
WASHINGTON, D.C. 20580

June 5, 2020
Via Electronic Mail

Isagenix International LLC,
c/o Justin Powell, General Counsel
155 E. Rivulon Boulevard
Gilbert, Arizona 85297

Warning Regarding Health and Earnings Claims Related to Coronavirus Disease 2019 (COVID-19)

Dear Mr. Powell,

FTC staff has reviewed social media posts made by Isagenix International LLC (“Isagenix”) business opportunity participants or representatives that unlawfully advertise that certain products treat or prevent Coronavirus Disease 2019 (COVID-19) and misrepresent that consumers who become Isagenix business opportunity participants are likely to earn substantial income. This letter is to provide you with information about laws and regulations enforced by the Federal Trade Commission (“FTC”) that may bear upon your business activities, including the activities of your business opportunity participants and representatives.

An example of Coronavirus prevention or treatment claims made by your business opportunity participants or representatives include:

- “In the fight against COVID-19 – Keep moving every day and eating healthy! Isagenix shakes boost your immunity 500%!”

Some examples of earnings claims made by your business opportunity participants or representatives include:

- “The last 1 1/2 months of this covid-19 pandemic has made me even more GRATEFUL.... We have been able to put [our daughter] through 4 years of college @ MSU and give her a head start in her next chapter of life with no college debt.... It breaks my heart to see families struggling nutritionally and financially, especially when we have such an amazing and LIFE CHANGING SOLUTION to help them on all fronts. RESIDUAL INCOME IS A GAME CHANGER, and if you are just OPEN to listening, it can change your family’s life too.”
- “Will you get a stimulus check? . . . [W]ould a extra \$4,100 change your family lifestyle? Well my firm is offering that and more so who is this firm . . . Text Isagenix to [5 digit SMS text number].”

It is unlawful under the FTC Act, 15 U.S.C. § 41 *et seq.*, to advertise that a product can prevent, treat, or cure human disease unless you possess competent and reliable scientific evidence, including, when appropriate, well-controlled human clinical studies, substantiating that the claims are true at the time they are made. For COVID-19, no such study is currently known to exist for the products identified above. Thus, any coronavirus-related prevention or treatment claims regarding such products are not supported by competent and reliable scientific evidence. You must immediately cease making all such claims.

Additionally, representations about a business opportunity, including earnings claims, violate Section 5 of the FTC Act, 15 U.S.C. § 41 *et seq.*, if they are false, misleading, or unsubstantiated and material to consumers. Express and implied earnings claims must be truthful and non-misleading to avoid being deceptive, which means that claims about the potential to achieve a wealthy lifestyle, career-level income, or significant income are false or misleading if business opportunity participants generally do not achieve such results. Even truthful testimonials from participants who do earn significant income or more will likely be misleading unless the advertising also makes clear the amount earned or lost by most participants. Your business opportunity participants and representatives must immediately cease making all express and implied earnings claims that would be false or misleading to current or prospective participants.

You are responsible for the claims of your business opportunity participants and representatives. As the FTC stated in the January 2019 [Business Guidance Concerning Multi-Level Marketing](#), the compensation structure of a Multi-Level Marketing entity (“MLM”) may create incentives for its participants to make certain representations to current or prospective participants. “As a consequence, an MLM should (i) direct its participants not to make false, misleading, or unsubstantiated representations and (ii) monitor its participants so they don’t make false, misleading, or unsubstantiated representations.”

You are advised to review all claims relating to your products and business opportunity and immediately cease, and require your business opportunity participants and representatives to cease, making claims that are not supported by the evidence or substantiation described above.

Within 48 hours, please send reply via email to COVID-19-Task-Force@ftc.gov describing the specific actions you have taken to address the FTC’s concerns. If you have any questions regarding compliance with the FTC Act, please contact us at COVID-19-Task-Force@ftc.gov.

Sincerely,

Federal Trade Commission Staff



UNITED STATES OF AMERICA
Federal Trade Commission
WASHINGTON, D.C. 20580

June 5, 2020
Via Electronic Mail

The Juice Plus+ Company,
c/o Paulo Teixeira, CEO
140 Crescent Drive
Collierville, Tennessee 38017

Warning Regarding Health and Earnings Claims Related to Coronavirus Disease 2019 (COVID-19)

Dear Mr. Teixeira,

FTC staff has reviewed social media posts made by The Juice Plus+ Company (“Juice Plus”) business opportunity participants or representatives that unlawfully advertise that certain products treat or prevent Coronavirus Disease 2019 (COVID-19) and misrepresent that consumers who become Juice Plus business opportunity participants are likely to earn substantial income. This letter is to provide you with information about laws and regulations enforced by the Federal Trade Commission (“FTC”) that may bear upon your business activities, including the activities of your business opportunity participants and representatives.

Some examples of Coronavirus prevention or treatment claims made by your business opportunity participants or representatives include:

- “I for one will NEVER take a vaccine for the #WuhanVirus #KungFlu. I have never had an influenza shot why the hell would I get this one? And I have never had the flu as an adult. #JuicePlus @juiceplus”
- A post with “#juiceplus #immunesupport #immunesystem #covid19” that links to another post with an image with the statement, “More than 40 individual Juice Plus+ clinical studies have been conducted by researchers at leading hospitals and universities around the world” and captioned with “#juiceplus #immunesupport #immunesystem #covid19.”

Some examples of earnings claims made by your business opportunity participants or representatives include:

- A video containing the statements, “There are a lot of people out there who have lost income You may want to build a side income, you know, make \$500 a month, \$1,000 a month or more. There’s no ceiling on this. It’s whatever you want it to be. . . . What would you like this do to for you? . . . Maybe it could cover one of your bills, like a car payment. Or enjoy more time and financial freedom. I can tell you those are both possible at the same time because I’ve been

living that for the past eight years, and it's wonderful to be able to offer that to other people.”

- A video containing the statement, “What would you do—especially now, so many people have lost their jobs or their income—if you had an extra \$500 to \$1,000 a month or more? Because it can be whatever you want it to be.”

It is unlawful under the FTC Act, 15 U.S.C. § 41 *et seq.*, to advertise that a product can prevent, treat, or cure human disease unless you possess competent and reliable scientific evidence, including, when appropriate, well-controlled human clinical studies, substantiating that the claims are true at the time they are made. For COVID-19, no such study is currently known to exist for the products identified above. Thus, any coronavirus-related prevention or treatment claims regarding such products are not supported by competent and reliable scientific evidence. You must immediately cease making all such claims.

Additionally, representations about a business opportunity, including earnings claims, violate Section 5 of the FTC Act, 15 U.S.C. § 41 *et seq.*, if they are false, misleading, or unsubstantiated and material to consumers. Express and implied earnings claims must be truthful and non-misleading to avoid being deceptive, which means that claims about the potential to achieve a wealthy lifestyle, career-level income, or significant income are false or misleading if business opportunity participants generally do not achieve such results. Even truthful testimonials from participants who do earn significant income or more will likely be misleading unless the advertising also makes clear the amount earned or lost by most participants. Your business opportunity participants and representatives must immediately cease making all express and implied earnings claims that would be false or misleading to current or prospective participants.

You are responsible for the claims of your business opportunity participants and representatives. As the FTC stated in the January 2019 [Business Guidance Concerning Multi-Level Marketing](#), the compensation structure of a Multi-Level Marketing entity (“MLM”) may create incentives for its participants to make certain representations to current or prospective participants. “As a consequence, an MLM should (i) direct its participants not to make false, misleading, or unsubstantiated representations and (ii) monitor its participants so they don’t make false, misleading, or unsubstantiated representations.”

You are advised to review all claims relating to your products and business opportunity and immediately cease, and require your business opportunity participants and representatives to cease, making claims that are not supported by the evidence or substantiation described above.

Within 48 hours, please send reply via email to COVID-19-Task-Force@ftc.gov describing the specific actions you have taken to address the FTC’s concerns. If you have any questions regarding compliance with the FTC Act, please contact us at COVID-19-Task-Force@ftc.gov.

Sincerely,

Federal Trade Commission Staff



UNITED STATES OF AMERICA
Federal Trade Commission
WASHINGTON, D.C. 20580

June 5, 2020
Via Electronic Mail

Melaleuca Inc.
c/o Jay Cobb, Senior Counsel
4609 West 65th South,
Idaho Falls, Idaho 83402

**Warning Regarding Earnings Claims Related to Coronavirus
Disease 2019 (COVID-19)**

Dear Mr. Cobb:

FTC staff has reviewed social media posts made by Melaleuca Inc. (“Melaleuca”) business opportunity participants or representatives that unlawfully misrepresent that consumers who become Melaleuca business opportunity participants are likely to earn substantial income. This letter is to provide you with information about laws and regulations enforced by the Federal Trade Commission (“FTC”) that may bear upon your business activities, including the activities of your business opportunity participants and representatives.

Some examples of earnings claims made by your business opportunity participants or representatives include:

- “[B]efore you say ‘ that’s not enough money’, please consider EVERY DIRECTOR at Melaleuca has been getting a paycheck through this entire pandemic/crisis!... If everybody is spending \$100/month... @ 20% = \$20/customer x 20 customers = \$400/month income – FOREVER.... This income will NEVER go away!”
- “Need money? Have you considered shareholders of big retail stores are not missing a paycheck bc you are still shopping with them? Want to bank some of those profits for yourself? Let’s do it! Initial investment about \$20!... Don’t think this is a good investment? This company has survived the recession of ‘08 and has now grown to a \$2 Billion per year in sales! It is recession proof bc you need and use everything you buy! You need 8 friends that want to make money. You earn \$500 next month - doesn’t sound like much BUT you will get another paycheck every month when those same friends/family shop again - residual income! Private message me to learn more. This is a huge opportunity for the common man to bank some of those shareholder profits!”

Representations about a business opportunity, including earnings claims, violate Section 5 of the FTC Act, 15 U.S.C. § 41 *et seq.*, if they are false, misleading, or unsubstantiated and material to consumers. Express and implied earnings claims must be truthful and non-misleading

to avoid being deceptive, which means that claims about the potential to achieve a wealthy lifestyle, career-level income, or significant income are false or misleading if business opportunity participants generally do not achieve such results. Even truthful testimonials from participants who do earn significant income or more will likely be misleading unless the advertising also makes clear the amount earned or lost by most participants. Your business opportunity participants and representatives must immediately cease making all express and implied earnings claims that would be false or misleading to current or prospective participants.

You are responsible for the claims of your business opportunity participants and representatives. As the FTC stated in the January 2019 [Business Guidance Concerning Multi-Level Marketing](#), the compensation structure of a Multi-Level Marketing entity (“MLM”) may create incentives for its participants to make certain representations to current or prospective participants. “As a consequence, an MLM should (i) direct its participants not to make false, misleading, or unsubstantiated representations and (ii) monitor its participants so they don’t make false, misleading, or unsubstantiated representations.”

You are advised to review all claims relating to your business opportunity and immediately cease, and require your business opportunity participants and representatives to cease, making claims that are not supported by the evidence or substantiation described above.

Within 48 hours, please send reply via email to COVID-19-Task-Force@ftc.gov describing the specific actions you have taken to address the FTC’s concerns. If you have any questions regarding compliance with the FTC Act, please contact us at COVID-19-Task-Force@ftc.gov.

Sincerely,

Federal Trade Commission Staff



UNITED STATES OF AMERICA
Federal Trade Commission
WASHINGTON, D.C. 20580

June 5, 2020
Via Electronic Mail

Youngevity International, Inc.
c/o Stephen Wallach, CEO
2400 Boswell Rd.
Chula Vista, CA 91914

Warning Regarding Health Claims Related to Coronavirus Disease 2019 (COVID-19)

Dear Mr. Wallach,

FTC staff has reviewed Youngevity International, Inc.'s ("Youngevity") corporate website and social media posts by Youngevity business opportunity participants or representatives that unlawfully advertise that certain products treat or prevent Coronavirus Disease 2019 ("COVID-19"). This letter is to provide you with information about laws and regulations enforced by the FTC that may bear upon your business activities, including the activities of your business opportunity participants and representatives.

An example of a health claim made on your corporate website is:

- "#FlattenTheCurve Shop Immune Support" (clicking on "Shop Immune Support" redirects to a page displaying various Youngevity "immune support" products for sale)

Some examples of health claims made by your business opportunity participants or representatives include:

- "Vaccines and Trick or Treat Medicine. The desire to trick the body rather than support the body. The desire to treat the body, rather than support the body's ability to heal. Before I go on a Covid-19... talk... It is always better to be prepared. Preparation is everything. Let's not allow them to allow more Americans to die needlessly.... So since most people are over 150 pounds, anyone who has Covid-19 should have: 1 Healthy Bran and Heart Pak [link to distributor sales page] 1 Healthy Bone and Joint Pak [link to distributor sales page] 1 Immunity Health Pak [link to distributor sales page] With these, your body will be able to withstand and eliminate Covid-19 and the vaccines forthcoming for Covid-19. Also get your Rebound FX – Stay Safe. #youngevity #flattenthecurve #covid19 #coronavirus"
- Speaker describes dangers of coronavirus and panic it has caused and then states, "Y por eso, hemos hechado mano de los expertos, para que sean ellos quienes nos

den recomendaciones específicas de qué hacer y cómo hacerlo. Preguntamos al doctor y científico Joel Wallach, una persona que ha sido nominada a un premio Nobel, y que sus libros han sido distribuidos por todo el mundo. Él menciona de que las personas que hayan fallecido por causa de este virus son personas que tienen su sistema inmune muy bajo. Y es por eso que recomienda subir su sistema inmune, fortalecer sus defensas. Al preguntarle cómo lo hacemos, nos decía tres cosas muy importantes, a lo cual Ud. debe de tomar nota ahora mismo. Lo primero es eliminar la cantidad de suciedad o toxinas del cuerpo. [image of Youngevity Liver Pure supplements.] Significa hacerse una desintoxicación integral. Lo segundo: darle al cuerpo una nutrición correcta. Recuerde que cada una de nuestras células requiere cinco ingredientes principales para funcionar de manera óptima. Estos cinco ingredientes distribuidos [image of various Youngevity supplements] en noventa nutrientes esenciales. El doctor y científico Joel Wallach nos recomienda la famosa fórmula de “90 for life.” Y la tercera y más importante recomendación es que Ud. tome acción ahora mismo...”¹

It is unlawful under the FTC Act, 15 U.S.C. § 41 *et seq.*, to advertise that a product can prevent, treat, or cure human disease unless you possess competent and reliable scientific evidence, including, when appropriate, well-controlled human clinical studies, substantiating that the claims are true at the time they are made. For COVID-19, no such study is currently known to exist for the products identified above. Thus, any coronavirus-related prevention or treatment claims regarding such products are not supported by competent and reliable scientific evidence. You must immediately cease making all such claims.

You are responsible for the claims of your business opportunity participants and representatives. As the FTC stated in the January 2019 [Business Guidance Concerning Multi-Level Marketing](#), the compensation structure of a Multi-Level Marketing entity (“MLM”) may create incentives for its participants to make certain representations to current or prospective participants. “As a consequence, an MLM should (i) direct its participants not to make false, misleading, or unsubstantiated representations and (ii) monitor its participants so they don’t make false, misleading, or unsubstantiated representations.”

You are advised to review all claims relating to your business opportunity and immediately cease, and require your business opportunity participants and representatives to cease, making claims that are not supported by the evidence or substantiation described above.

¹ “And that is why we have reached out to experts, so that they can be the ones to give us specific recommendations on what to do and how to do it. We asked the doctor and scientist Joel Wallach, a person who has been nominated to a Nobel prize, and whose books have been distributed all over the world. He mentions that the people who have died because of this virus are people that have a very low immune system. And that is why he recommends to boost your immune system, strengthen your defenses. When asked how do we do this, he told us three very important things, of which you should take note right now. The first is eliminate the amount of dirt or toxins from the body. [image of Youngevity Liver Pure supplements.] This means to do a whole detoxification. The second: give the body the correct nutrition. Remember that each of our cells requires five principal ingredients to function in an optimal way. These five ingredients distributed [image of various Youngevity supplements] in ninety essential nutrients. The doctor and scientist Joel Wallach recommends to us the famous formula of “90 for life.” And the third and most important recommendation is that you to take action now.”

Within 48 hours, please send reply via email to COVID-19-Task-Force@ftc.gov describing the specific actions you have taken to address the FTC's concerns. If you have any questions regarding compliance with the FTC Act, please contact us at COVID-19-Task-Force@ftc.gov.

Sincerely,

Federal Trade Commission Staff



UNITED STATES OF AMERICA
Federal Trade Commission
WASHINGTON, D.C. 20580

June 5, 2020
Via Electronic Mail

Vivri USA, LLC
c/o Daniel Chavez Saul
2629 N Stemmons Fwy
Ste. 105
Dallas, TX 75207

Warning Regarding Health Claims Related to Coronavirus Disease 2019 (COVID-19)

Dear Mr. Saul:

Federal Trade Commission (“FTC”) staff has reviewed social media posts made by Vivri USA, LLC (“Vivri”) business opportunity participants or representatives that unlawfully advertise that certain products treat or prevent Coronavirus Disease 2019 (“COVID-19”). This letter is to provide you with information about laws and regulations enforced by the FTC that may bear upon your business activities, including the activities of your business opportunity participants and representatives.

Some examples of COVID-19 prevention or treatment claims made by your business opportunity participants or representatives include:

- A video in which the narrator, while describing the contents of a Vivri product, states “...y otros minerales que van a hacer que nuestras defensas se incrementen o se fortalezcan y una persona saludable, una persona bien nutrida, va a poder hacerle frente a este tema del coronavirus.... Lo que necesitamos es hacer que nuestro cuerpo active las defensas que van a proteger contra este virus.”¹
- “Cuida tu salud, tu cuerpo, Evita muchas enfermedades muchos virus, ya q este virus y muchos más llegaron para quedarse, coronavirus, influenza, gripe, debemos nutrir nuestras células, nuestro sistema inmune, reforzarlo con el mejor sistema de nutrición del mundo VIVRI, el mejor 100% natural, organico, evitate muchas enfermedades, comiendo frutas y verduras, y hacer ejercicio es la clave, estamos ala orden mi pag. [link to distributor sales page].”²

¹ “...and other minerals that are going to increase or strengthen our defenses, and a healthy person, a well-nourished person, will be able to face this coronavirus issue.... What we need to do is make our body activate the defenses that will protect us from this virus.”

² “Take care of your health, your body, avoid many diseases many viruses, since this virus and many others are here to stay, coronavirus, influenza, flu, we should nourish our cells, our immune systems, reinforce it with the best nutrition system in the world VIVRI, the best 100% natural, organic, avoid many diseases, eating fruits and vegetables, and exercising is the key, we are at your service my page. [link to distributor sales page].”

It is unlawful under the FTC Act, 15 U.S.C. § 41 *et seq.*, to advertise that a product can prevent, treat, or cure human disease unless you possess competent and reliable scientific evidence, including, when appropriate, well-controlled human clinical studies, substantiating that the claims are true at the time they are made. For COVID-19, no such study is currently known to exist for the products identified above. Thus, any coronavirus-related prevention or treatment claims regarding such products are not supported by competent and reliable scientific evidence. You must immediately cease making all such claims. You are responsible for the claims of your business opportunity participants and representatives. As the FTC stated in the January 2019 [Business Guidance Concerning Multi-Level Marketing](#), the compensation structure of a Multi-Level Marketing entity (“MLM”) may create incentives for its participants to make certain representations to current or prospective participants. “As a consequence, an MLM should (i) direct its participants not to make false, misleading, or unsubstantiated representations and (ii) monitor its participants so they don’t make false, misleading, or unsubstantiated representations.”

You are advised to review all claims relating to your products and immediately cease, and require your business opportunity participants and representatives to cease, making claims that are not supported by the evidence or substantiation described above.

Within 48 hours, please send reply via email to COVID-19-Task-Force@ftc.gov describing the specific actions you have taken to address the FTC’s concerns. If you have any questions regarding compliance with the FTC Act, please contact us at COVID-19-Task-Force@ftc.gov.

Sincerely,

Federal Trade Commission Staff



UNITED STATES OF AMERICA
Federal Trade Commission
WASHINGTON, D.C. 20580

June 5, 2020
Via Electronic Mail

Plexus Worldwide, LLC
c/o Chris Reid, VP Compliance
& General Counsel
9145 E Pima Center Pkwy
Scottsdale, AZ 85258

**Warning Regarding Health Claims Related to Coronavirus
Disease 2019 (COVID-19)**

Dear Mr. Reid:

Federal Trade Commission (“FTC”) staff has reviewed social media posts made by Plexus Worldwide, LLC (“Plexus Worldwide”) business opportunity participants or representatives that unlawfully advertise that certain products treat or prevent Coronavirus Disease 2019 (“COVID-19”). This letter is to provide you with information about laws and regulations enforced by the FTC that may bear upon your business activities, including the activities of your business opportunity participants and representatives.

Some examples of COVID-19 prevention or treatment claims made by your business opportunity participants or representatives include:

- A post stating “#Plexus #coronavirüsü #prep #vitamins #health #covid_19 #covid19” and linking to another post stating “#Plexus #coronavirüsü #prep #vitamins #health #covid_19 #covid19” next to an image of Plexus Worldwide products and the text “Boost your immunity with our EVERYDAY WELLNESS COMBO....”
- “#VIRUS_CORONA Worried? I’ve been boosting my immune system for several years with high-quality Plexus supplements. You can too! #Plexus provides excellent all-natural supplements that truly work. Be sensible –not fearful. Scientifically formulated & doctor-approved! Ask me!”
- A post stating “We know that runaway inflammation is the culprit behind this virus. We’ve all seen what happens when the virus sneaks into the lungs. It gets worse – recently, researchers discovered it can damage your heart muscle... and even slip into your brain, causing loss of smell and taste. So, how do you stop runaway inflammation from damaging your lungs, heart and brain? And how do you protect against the virus in the first place? By giving your immune system an ‘energy upgrade’. Your immune system requires a TON of energy to fight the virus. Without enough energy, the virus wins and triggers runaway inflammation.

So, it's CRUCIAL to get your immune system the energy it needs. These can help!!" above an image of four Plexus Worldwide products.

- A post stating "Great information! Looks like the SAME probiotics strains and enzymes that are in my ProBio5 are being used to help treat COVID-19 symptoms. Almost all patients have shown an irregularity in their gut microbiota following treatment. Probiotics and pre-biotics are being used to avoid secondary reinfection.... #PlexusGetActive" next to an image stating "Some patients with COVID-19 showed intestinal microbialdysbiosis with decreasedprobtiotics [sic] such as *Lactobacillus* and *Bifidobacterium*. Nutritional and gastrointestinal function should be assessed for all patients.Nutritional [sic] support and application of prebiotics or probiotics were suggested to regulate the balance of intestinal microbiota and reduce the risk of secondary infection due to bacterial translocation."

It is unlawful under the FTC Act, 15 U.S.C. § 41 *et seq.*, to advertise that a product can prevent, treat, or cure human disease unless you possess competent and reliable scientific evidence, including, when appropriate, well-controlled human clinical studies, substantiating that the claims are true at the time they are made. For COVID-19, no such study is currently known to exist for the products identified above. Thus, any coronavirus-related prevention or treatment claims regarding such products are not supported by competent and reliable scientific evidence. You must immediately cease making all such claims.

You are responsible for the claims of your business opportunity participants and representatives. As the FTC stated in the January 2019 [Business Guidance Concerning Multi-Level Marketing](#), the compensation structure of a Multi-Level Marketing entity ("MLM") may create incentives for its participants to make certain representations to current or prospective participants. "As a consequence, an MLM should (i) direct its participants not to make false, misleading, or unsubstantiated representations and (ii) monitor its participants so they don't make false, misleading, or unsubstantiated representations."

You are advised to review all claims relating to your products immediately cease, and require your business opportunity participants and representatives to cease, making claims that are not supported by the evidence or substantiation described above.

Within 48 hours, please send reply via email to COVID-19-Task-Force@ftc.gov describing the specific actions you have taken to address the FTC's concerns. If you have any questions regarding compliance with the FTC Act, please contact us at COVID-19-Task-Force@ftc.gov.

Sincerely,

Federal Trade Commission Staff