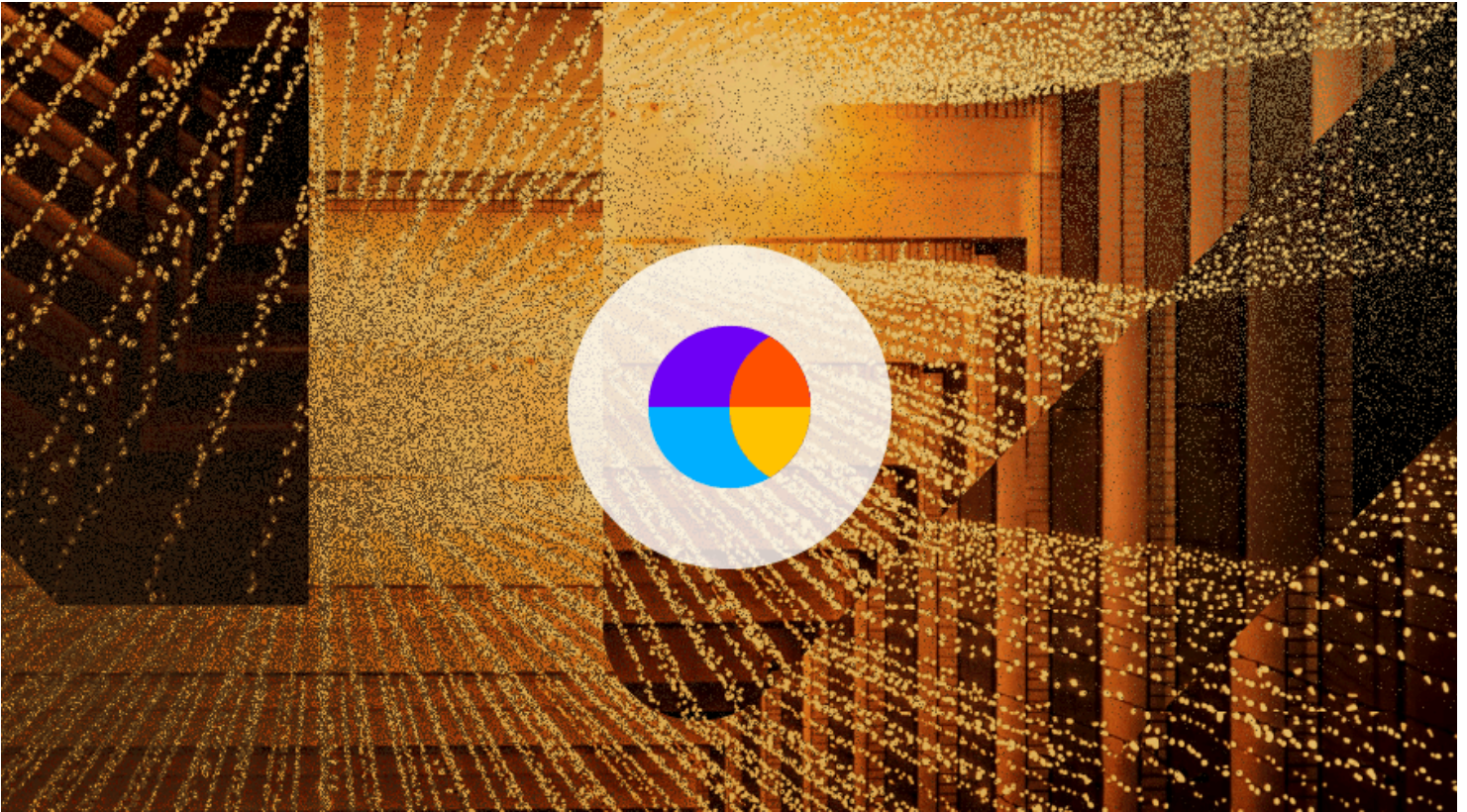


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# Case #254-2026: Administrative Closure – LifeWave, Inc.

## BBB NATIONAL PROGRAMS

Direct Selling Self-Regulatory Council

Case #254-2026: Administrative Closure – LifeWave, Inc.

## Company Description

LifeWave, Inc. (“LifeWave” or the “Company”) is a direct selling company that specializes in wearable wellness technology, primarily phototherapy patches designed to stimulate the body’s natural healing processes. The Company was founded in 2004 and is headquartered in San Diego, California.

## Basis of Inquiry

The Direct Selling Self-Regulatory Council (“DSSRC”), a national advertising self-regulation program administered by BBB National Programs, initiated this inquiry as part of its ongoing, independent monitoring of advertising and marketing claims within the direct selling industry.

This matter pertained to direct selling earnings and product performance claims that have been disseminated on behalf of LifeWave on Facebook and a salesforce member’s blog page. DSSRC was concerned that such claims may communicate unsupported expectations regarding the amount of income that would be generally expected by typical Company salesforce members through participation in the LifeWave business opportunity, as well as the effectiveness of its products in treating serious health conditions.

The representative claims set forth below formed the basis of this inquiry:

### *Earnings Claims*

1. “This opportunity has the potential to help individuals achieve financial stability and offers the chance to travel around the world at no cost.” (April 2025)
2. “I remember when we were discussing “financial goals and dreams” on a Lifewave business training and my beautiful friend, business partner Heidi Porter Sarnecki said she had a barn where they hosted weddings and she really wanted a concrete dance floor but it was quite expensive. She was hoping through Lifewave that sometime she would be able to afford the dance floor ...” Screenshot of text message with copy stating “Starting the concrete job for my outdoor dance floor by my barn!! With the walkway and the bistro area by the beverage shack, it’s a \$53,000 job! So thankful for lifewave money!!!.” (August 2024)
3. “...the financial opportunity is something we have never experienced!! Top to bottom- Lifewave is leading the charge. From products to innovation to compensation to the incentive trips!!” (October 2023)
4. “Wow wow wow. What a week. My organization just had our biggest week ever. \$8,700,000 for the WEEK. Steve and Gina Merritt (my personals) and their team did \$4 Million for the week. And my other teams which include Marci Prebble, Peter Ngo, Dr Staci, Phil, Charity, Gayla Wahl, and Bart and many many more leaders did \$4.7 Million. Wow. What a team. Super proud to be a part of this amazing group of leaders.” (December 2024)
5. “For years after I left nursing, I dreamed about having some type of business that I would light me up and create income – where I could reclaim my financial independence... 4 months later LifeWave landed in my lap! I knew I wanted to create something aligned with deep purpose, to work with flexibility around my family life and never have to stress about money again...”
6. “🌟\$1 Million in Sales. 18 Months. Countless Lives Impacted. 🌟  
In just 18 months, our incredible personally enrolled team has done over \$1 million dollars in sales with LifeWave... This isn’t just about health breakthroughs. It’s about financial freedom, family stability, and people stepping into their calling to help others – physically, mentally, relationally, spiritually, and financially.” (August 2025)
7. “Since joining LifeWave, the results have been on a completely different level. This past week alone, my back office showed over \$1 million in team volume. That still blows my mind.” (June 2025)
8. “We’ve got a one of a kind, patented product with **no competition** and a compensation plan that has **unlimited potential**.”  
“ABILITY TO MAKE \$25,000 A WEEK” (Advanced Pack and Premium Pack)

### *Product Performance Claims*

1. “As many of you know, my dear mother has been battling health challenges, including the awful Alzheimer's disease and other difficulties... A few months ago in August, we turned to Lifewave patches as part of my Mom's wellness regimen in a last gasp effort. The results have been nothing short of miraculous... There are no words to express the profound changes we've witnessed. From the remarkable healing and closing of nasty wounds to moments where she recognizes me, calls my name twice in a sentence & this after 14 months... It's a journey filled with hope and gratitude, and we attribute these improvements to the stem cell patches since starting with Lifewave.” (February 2024)
2. “Autoimmune disease is, unfortunately, a life long reality for me, as it is for many of you. In the search for healthy, natural ways to help my body heal itself, I’ve discovered the Lifeway X39 patches. I use them daily, which works with my own body’s energy to keep its inflammatory response in check.” Accompanying text stating “Depression, cancer, heart disease, obesity, diabetes, dementia, allergies, asthma, chronic fatigue, autoimmune disease and more are all inflammatory diseases.” (December 2023)

## Company Position

LifeWave appreciated DSSRC’s review of this matter and stated that it took seriously its obligation to ensure that its independent salesforce members marketed the Company’s business opportunity in a truthful and responsible manner. Upon receipt of DSSRC’s inquiry, LifeWave initiated an internal review of the identified social media posts and worked directly with the field to secure their removal.

As a result of these efforts, all identified posts were removed shortly after receipt of DSSRC’s notice. The Company maintained that it was committed to promoting accurate and substantiated representations of the LifeWave business opportunity.

### **Administratively Closed Resolution**

Through its compliance and outreach efforts, LifeWave facilitated the removal of all posts at issue in this inquiry. DSSRC acknowledged the Company’s good-faith actions to address the post that remained publicly available and determined that LifeWave’s response under the circumstances was appropriate and consistent with self-regulatory expectations.

In its review, DSSRC concluded that the earnings claims at issue could reasonably convey the message that a typical LifeWave salesforce member would be likely to earn substantial income through participation in the Company’s business opportunity. DSSRC determined that such representations may be reasonably interpreted as communicating expectations about generally achievable results for typical Company salesforce members that require appropriate substantiation and context. Also of concern were product performance claims that LifeWave products could treat serious health conditions, such as Alzheimer’s. DSSRC found that such claims may be reasonably construed as communicating unsubstantiated product expectations.

The Federal Trade Commission’s (FTC) Business Guidance Concerning Multi-Level Marketing provides that earnings claims must reflect what participants can generally expect to earn. The FTC has cautioned that representations highlighting the potential for significant income are often not indicative of the results achieved by typical participants and, if not properly qualified, may mislead consumers.<sup>1</sup> The FTC Guidance further explains that atypical income or lifestyle claims must be supported by competent and reliable evidence demonstrating that the represented results are typical. In the absence of such substantiation—and without clear and conspicuous disclosures regarding generally expected earnings—inspirational or high-level income claims may create a misleading impression of the opportunity.<sup>2</sup>

Consistent with this framework, DSSRC’s Guidance on Earnings Claims for the Direct Selling Industry advises companies and their salesforce members to refrain from using statements or imagery that suggest income levels beyond what an average participant could reasonably expect to achieve. DSSRC has identified the term “financial freedom” as particularly susceptible to consumer misinterpretation.<sup>3</sup> Prior DSSRC decisions have found that aspirational language, when presented without adequate explanation or qualification, may reasonably be interpreted as a promise of substantial or life-changing income.<sup>4</sup>

With regard to the product performance claims identified in this inquiry, the FTC’s Business Guidance Concerning Multi-Level Marketing makes clear that health-related claims must be supported by competent and reliable scientific evidence at the time they are made. Accordingly, any representations by direct selling companies or their participants about a product’s performance must be accurate, not misleading, and adequately substantiated when communicated.<sup>5</sup>

In light of the Company’s documented actions demonstrating genuine and good-faith efforts to address DSSRC’s concerns, DSSRC determined that administrative closure of the inquiry was appropriate.

### **Conclusion**

DSSRC appreciated LifeWave’s prompt and good-faith cooperation in addressing the earnings and product claims identified in this inquiry. Based on the Company’s prompt actions to remove all of the posts identified in this inquiry and its continued commitment to ensuring that earnings and product representations accurately reflect generally expected results, DSSRC determined that the matter was appropriately resolved through administrative closure.

### **Company Statement**

“LifeWave is committed to being an exemplary corporate citizen by striving to promote only the best business practices at the corporate and brand partner levels. The Company promotes ethical and compliant business practices at both the corporate and Brand Partner levels through a compliance framework designed to prevent, detect, and address potential violations. In recognizing the vital importance of maintaining compliance with regulatory standards, LifeWave continually focuses its efforts on bolstering its program through ongoing investment in compliance personnel, monitoring systems and internal controls. The company regularly reviews and updates its Policies & Procedures to reflect current regulatory needs, utilizes top compliance monitoring systems and platforms to identify and address potential risks, and develops training programs and tools to provide Brand Partners with clear guidance for a deeper understanding of best practices.”

(Case #254, closed on 4/1/26)  
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[1] *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>.

[2] *Id.*

[3] Direct Selling Self-Regulatory Council, Guidance on Earnings Claims for the Direct Selling Industry, Section 6(A)(2022).

[4] *See* DSSRC Case #199-2025: LifeWave, Inc.

[5] *Supra* at 1, paragraph 26.

April 10, 2026

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