



Kevin Heaphy  
General Counsel  
[kevin.heaphy@isagenixcorp.com](mailto:kevin.heaphy@isagenixcorp.com)

February 27, 2024

Truth in Advertising, Inc  
Laura Smith, Esq.  
P.O. Box 927  
Madison, CT 06443

Re: Response to Complaint of Deceptive Income Claims to Market the Isagenix Business Opportunity

Dear Ms. Smith,

We have received your letter dated February 14, 2024, identifying potentially deceptive income claims used to market the Isagenix business opportunity. We appreciate Truth in Advertising, Inc. (“TINA.org”) monitoring the network marketing industry and bringing these claims to our attention. We have investigated them as part of our ongoing compliance program and taken the steps outlined in this letter.

At Isagenix, we recognize the importance of a robust and active compliance program to educate our Associates and take corrective action where necessary. Isagenix provides initial education and instruction to associates on how to describe the Isagenix opportunity in a truthful manner, including by making available the DSSRC’s latest Guidance on Earnings Claims for the Direct Selling Industry. Our compliance team then actively uses IntegriShield to monitor numerous websites for non-compliant posts. We personally contact members with non-compliant posts and work with them to either revise their post, add necessary disclaimers, or remove them. Although we have Associate Social Media guides and compliance tools available to all associates at any time, we have addressed and resolved approximately 550 non-compliant income claims in the past six months and used that opportunity to further educate the associates involved. We also make full and transparent information about the Isagenix business opportunity available for prospective associates on [Isagenixearnings.com](http://Isagenixearnings.com).

Accordingly, we have taken the following actions on the claims referenced in your letter:

1. **Actions already taken:** Prior to receiving your letter, Isagenix had already acted with respect to four of the claims posted on TINA.org’s website. One associate was contacted on October 30, 2023 and removed their post immediately. Another associate was contacted on January 11, 2024, to remove non-compliant language and add a required disclaimer. Two other claims were made by associates that Isagenix had already terminated for failing to comply with the Isagenix Policies & Procedures. Nonetheless, we contacted these former associates by email and telephone and successfully caused them to remove their social media posts within twenty-four (24) hours.

The list also included a screenshot from our Start Ambassador program website. At the time we received your letter, that webpage had already been removed from our public website and was not available to consumers. We will ensure that any content replacing this website will comply with applicable rules and regulations governing income claims.

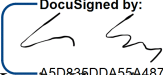
February 27, 2024

Response letter Laura Smith – Truth in Advertising

2. **Immediate Removal of Isagenix Videos:** We have reviewed the videos posted by Isagenix to the Isagenix International, LLC YouTube, Facebook, and Vimeo accounts. We have immediately removed each of them and will evaluate them for noncompliant income claims. Please note that several of the videos cited by TINA.org's website were outdated and no longer used by Isagenix.
3. **Compliance Communications to Associates:** Immediately upon receiving your letter, we notified by telephone and email all the remaining associates posting income claims listed by TINA.org. Within twenty-four (24) hours of our notice, each of the posts was removed. Our ability and willingness to respond swiftly demonstrates our ongoing and vigorous commitment to compliance.
4. **Monitoring:** We have used the claims identified by TINA.org to enhance our monitoring mechanisms and proactively identify and address any future instances of deceptive income claims. We will continue to train our associates on these and other examples to avoid disseminating any misleading or deceptive information.

We trust that our immediate response in addressing these posts as part of our ongoing compliance monitoring efforts gives you assurances that we share in TINA.org's desire for truthful advertising. Likewise, we appreciate the opportunity to address these concerns and demonstrate our commitment to a culture of compliance.

Sincerely,

DocuSigned by:  
  
ASD836DDA55A487...

Kevin Heaphy  
General Counsel

[Kevin.Heaphy@IsagenixCorp.com](mailto:Kevin.Heaphy@IsagenixCorp.com)

Cc via email: Joseph Mariano, President  
Direct Selling Association  
[jmariano@dsa.org](mailto:jmariano@dsa.org)

Peter Marinello, Vice President  
Direct Selling Self-Regulatory Council  
[pmarinello@bbbnp.org](mailto:pmarinello@bbbnp.org)