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6 Federal Trade Commission

7 **IN THE UNITED STATES DISTRICT COURT**
8 **FOR THE DISTRICT OF ARIZONA**

9 **Federal Trade Commission,**
10 Plaintiff,
11 vs.
12 **Forever Living Products International,**
13 **LLC, et al.,**
14 Defendants.

No. 2:26-cv-02526-CDB

UNOPPOSED MOTION FOR ENTRY
OF STIPULATED ORDER FOR
PERMANENT INJUNCTION AND
OTHER RELIEF

15
16 Plaintiff Federal Trade Commission, with the assent of all defendants, respectfully
17 move this Court to enter the attached proposed Stipulated Order for Permanent Injunction
18 and Other Relief (attached hereto as Exhibit A). The attached proposed Stipulated Order
19 for Permanent Injunction and Other Relief, agreed to and signed by all parties, will
20 resolve this matter as to all parties.

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Dated: 4/14/2026

Respectfully submitted,

/s/ Andrew Hudson

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FEDERAL TRADE COMMISSION

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CERTIFICATE OF SERVICE

I hereby certify that on April 14, 2026, I electronically filed the foregoing UNOPPOSED MOTION FOR ENTRY OF STIPULATED ORDER FOR PERMANENT INJUNCTION AND OTHER RELIEF with the Clerk of the Court using CM/ECF, and caused a copy of the same to be served on all parties in the manner specified below:

Via Email

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Counsel for Defendants

/s/ Andrew Hudson
Andrew Hudson

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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

Federal Trade Commission,

Plaintiff,

vs.

Forever Living Products International,

LLC, et al.,

Defendants.

No. 2:26-cv-02526-CDB

STIPULATED ORDER FOR
PERMANENT INJUNCTION
AND OTHER RELIEF

Plaintiff, the Federal Trade Commission (“Commission” or “FTC”), filed its Complaint for Permanent Injunction and Other Relief (“Complaint”), for a permanent injunction and other relief in this matter, pursuant to Section 13(b) of the Federal Trade Commission Act (“FTC Act”), 15 U.S.C. § 53(b). The Commission and Defendants stipulate to the entry of this Stipulated Order for Permanent Injunction and Other Relief (“Order”) to resolve all matters in dispute in this action between them.

THEREFORE, IT IS ORDERED as follows:

FINDINGS

1. This Court has jurisdiction over this matter.
2. The Complaint charges that Defendants participated in deceptive acts or practices in violation of Section 5 of the FTC Act, 15 U.S.C. § 45, in the promotion, marketing, and sale of opportunities to participate in Defendants’ multi-level marketing business by selling Defendants’ products and recruiting others to do the same.

1 D. **“Earnings”** means sales, income, profit, appreciation, or other financial
2 gain, such as bonuses, commissions, or free travel.

3 E. **“Multi-Level Marketing Program” or “MLM”** means any plan or
4 program in which a Participant has the right to (1) recruit others into the program or have
5 others placed in the Participant’s downline and (2) receive payment or other
6 compensation that is based, in whole or in part, upon purchases, sales, or any other
7 activities of the Participant’s downline.

8 F. **“Participant”** means any person who participates in any Business Venture,
9 including but not limited to, any person who is a Forever Business Owner (“FBO”).

10 **ORDER**

11 **I. Prohibited Misrepresentations**

12 IT IS ORDERED that Defendants, Defendants’ officers, agents, and employees,
13 and all other persons in active concert or participation with any of them, who receive
14 actual notice of this Order, whether acting directly or indirectly, in connection with the
15 advertising, marketing, promoting, or offering of any Business Venture, are permanently
16 restrained and enjoined from representing, including by providing others with the means
17 and instrumentalities with which to represent, expressly or by implication, the below
18 claims unless any such claim is non-misleading, and, at the time such claim is made,
19 Defendants possess and rely upon competent and reliable evidence sufficient to
20 substantiate that the claim is true:

21 A. That Participants will or are likely to make or receive Earnings, or will or
22 are likely to make or receive any particular level or amount of Earnings;

23 B. The Earnings any Participant actually made or received, or could make or
24 receive;

25 C. The reasons Participants do not make or receive Earnings or do not make or
26 receive any particular level or amount of Earnings, including but not limited to
27 representations that Participants fail to devote substantial or sufficient effort;

28 D. That Participants will or are likely to recruit others into their Downline; and

1 E. Any other fact material to consumers concerning the Business Venture,
2 such as: the total expenses and costs, any material restrictions, limitations, or conditions;
3 or any material aspect of its performance, efficacy, nature, or central characteristics.

4 **II. Prohibition on Failing to Maintain and Provide Substantiation for Earnings**
5 **Claims**

6 IT IS FURTHER ORDERED that Defendants, Defendants’ officers, agents, and
7 employees, and all other persons in active concert or participation with any of them, who
8 receive actual notice of this Order, whether acting directly or indirectly, in connection
9 with the advertising, marketing, promoting, or offering of any Business Venture, are
10 permanently restrained and enjoined from representing, including by providing others
11 with the means and instrumentalities with which to represent, expressly or by implication,
12 any representation regarding Participant Earnings unless, at the time the representation is
13 made:

14 A. Defendants have in their possession written materials that substantiate the
15 representation at the time the representation is made; and

16 B. Defendants make the written substantiation available upon request to the
17 FTC and any U.S. Participant or prospective U.S. Participant.

18 **III. Notice to Participants Concerning Order Prohibitions**

19 IT IS FURTHER ORDERED that Corporate Defendants must notify Participants
20 of this Order’s prohibitions, as follows:

21 A. Within 30 days of entry of this Order, Corporate Defendants must email
22 notice in the form shown in Attachment A to all U.S. Participants who, since January 1,
23 2023, have made a purchase or sale, recruited a Participant or preferred customer, or
24 otherwise engaged with the MLM business. The email notice must use the subject line
25 “Important Notice Regarding Forever Living Settlement with Federal Trade
26 Commission.” Corporate Defendants must send the notice from an email address that
27 Forever Living regularly uses to communicate with U.S. Participants and must make
28 commercially reasonable efforts to leverage technologies to ensure the deliverability of

1 emails (for example, but not limited to, SPF, DKIM, and use of sending IP addresses with
2 known good reputations). No information other than that contained in Attachment A shall
3 be included in or added to the notice required by this Section, nor shall any other
4 materials be transmitted with the notice.

5 B. Within 15 days of entry of this Order, Corporate Defendants must post a
6 prominent link to an exact copy of the form shown in Attachment A on the landing page
7 of the portion of their website for U.S. Participants only (including
8 <https://foreverliving.com/join/usa/en-us/fbo-enrollment>). Corporate Defendants shall
9 keep the notice posted on the above-listed page continuously for a period of 180 days
10 following the date of entry of this Order.

11 **IV. Monitoring Compliance with Order Prohibitions**

12 IT IS FURTHER ORDERED that Defendants, in connection with any Business
13 Venture that is marketed, offered, offered for sale, or sold, directly or indirectly, to
14 consumers in the United States, are hereby permanently restrained and enjoined from:

15 A. Failing to take reasonable steps to educate Participants on the requirements
16 of Sections I and II of this Order;

17 B. Failing to take all reasonable steps necessary to monitor and ensure that
18 Defendants' agents, representatives, employees, independent contractors, affiliates and
19 Participants comply with all relevant requirements of this Order;

20 C. Failing to take corrective action to prevent continued noncompliance with
21 this Order with respect to any person to whom this Order applies who is not complying
22 with the Order; and

23 D. Failing to promptly and thoroughly investigate any complaint received by
24 Defendants that relates to the subject matter of this Order and to notify the complainant
25 of the resolution of the complaint and the reason therefor.

26 **V. Order Acknowledgments**

27 IT IS FURTHER ORDERED that Defendants obtain acknowledgments of receipt
28 of this Order:

1 A. Each Defendant, within 7 days of entry of this Order, must submit to the
2 Commission an acknowledgment of receipt of this Order sworn under penalty of perjury.

3 B. For 10 years after entry of this Order, each Individual Defendant for any
4 business that such Defendant, individually or collectively with any other Defendants, is
5 the majority owner or controls directly or indirectly, and each Corporate Defendant, must
6 deliver a copy of this Order to: (1) all principals, officers, directors, and LLC managers
7 and members; (2) all employees having managerial responsibilities for conduct related to
8 the subject matter of the Order and all agents and representatives who participate in
9 conduct related to the subject matter of the Order; and (3) any business entity resulting
10 from any change in structure as set forth in the Section titled Compliance Reporting.
11 Delivery must occur within 7 days of entry of this Order for current personnel. For all
12 others, delivery must occur before they assume their responsibilities.

13 C. From each individual or entity to which a Defendant delivered a copy of
14 this Order, that Defendant must obtain, within 30 days, a signed and dated
15 acknowledgment of receipt of this Order.

16 **VI. Compliance Reporting**

17 IT IS FURTHER ORDERED that Defendants make timely submissions to the
18 Commission:

19 A. 1 year after entry of this Order, each Defendant must submit a compliance
20 report, sworn under penalty of perjury:

- 21 1) Each Defendant must: (a) identify the primary physical, postal, and
22 email address and telephone number, as designated points of contact,
23 which representatives of the Commission may use to communicate
24 with Defendant; (b) identify all of that Defendant's businesses by all
25 of their names, telephone numbers, and physical, postal, email, and
26 Internet addresses; (c) describe the activities of each business,
27 including the goods and services offered, the means of advertising,
28 marketing, and sales, and the involvement of any other Defendant

1 (which Individual Defendants must describe if they know or should
2 know due to their own involvement); (d) describe in detail whether
3 and how that Defendant is in compliance with each Section of this
4 Order; and (e) provide a copy of each Order Acknowledgment
5 obtained pursuant to this Order, unless previously submitted to the
6 Commission.

7 2) Additionally, each Individual Defendant must: (a) identify all
8 telephone numbers and all physical, postal, email and Internet
9 addresses, including all residences; (b) identify all business
10 activities, including any business for which such Defendant performs
11 services whether as an employee or otherwise and any entity in
12 which such Defendant has any ownership interest; and (c) describe
13 in detail such Defendant's involvement in each such business,
14 including title, role, responsibilities, participation, authority, control,
15 and any ownership.

16 B. For 10 years after entry of this Order, each Defendant must submit a
17 compliance notice, sworn under penalty of perjury, within 14 days of any change in the
18 following:

19 1) Each Defendant must report any change in: (a) any designated point
20 of contact; or (b) the structure of any Corporate Defendant or any
21 entity that Defendant has any ownership interest in or controls
22 directly or indirectly that may affect compliance obligations arising
23 under this Order, including: creation, merger, sale, or dissolution of
24 the entity or any subsidiary, parent, or affiliate that engages in any
25 acts or practices subject to this Order.

26 2) Additionally, each Individual Defendant must report any change in:
27 (a) name, including aliases or fictitious name, or residence address;
28 or (b) title or role in any business activity, including any business for

1 which such Defendant performs services whether as an employee or
2 otherwise and any entity in which such Defendant has any
3 ownership interest, and identify the name, physical address, and any
4 Internet address of the business or entity.

5 C. Each Defendant must submit to the Commission notice of the filing of any
6 bankruptcy petition, insolvency proceeding, or similar proceeding by or against such
7 Defendant within 14 days of its filing.

8 D. Any submission to the Commission required by this Order to be sworn
9 under penalty of perjury must be true and accurate and comply with 28 U.S.C. § 1746,
10 such as by concluding: “I declare under penalty of perjury under the laws of the United
11 States of America that the foregoing is true and correct. Executed on: _____” and
12 supplying the date, signatory’s full name, title (if applicable), and signature.

13 E. Unless otherwise directed by a Commission representative in writing, all
14 submissions to the Commission pursuant to this Order must be emailed to
15 DEbrief@ftc.gov or sent by overnight courier (not the U.S. Postal Service) to: Associate
16 Director for Enforcement, Bureau of Consumer Protection, Federal Trade Commission,
17 600 Pennsylvania Avenue NW, Washington, DC 20580. The subject line must begin:
18 FTC v. Forever Living Products International LLC, Matter No. X260013.

19 **VII. Recordkeeping**

20 IT IS FURTHER ORDERED that Defendants must create certain records for 10
21 years after entry of the Order, and retain each such record for 5 years. Specifically,
22 Corporate Defendants, in connection with any Business Venture, and each Individual
23 Defendant for any business that such Defendant, individually or collectively with any
24 other Defendants, is a majority owner or controls directly or indirectly, must create and
25 retain the following records:

26 A. accounting records showing the revenues from all goods or services sold;

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1 B. personnel records showing, for each person providing services, whether as
2 an employee or otherwise, that person's: name; addresses; telephone numbers; job title or
3 position; dates of service; and (if applicable) the reason for termination;

4 C. records of all consumer complaints and refund requests concerning the
5 subject matter of this Order, whether received directly or indirectly, such as through a
6 third party, and any response;

7 D. all records necessary to demonstrate full compliance with each provision of
8 this Order, including all submissions to the Commission; and

9 E. a copy of each unique advertisement or other marketing material, except for
10 advertisements or other marketing material related solely to physical goods.

11 **VIII. Compliance Monitoring**

12 IT IS FURTHER ORDERED that, for the purpose of monitoring Defendants'
13 compliance with this Order:

14 A. Within 14 days of receipt of a written request from a representative of the
15 Commission, each Defendant must: submit additional compliance reports or other
16 requested information, which must be sworn under penalty of perjury; appear for
17 depositions; and produce documents for inspection and copying. The Commission is also
18 authorized to obtain discovery, without further leave of court, using any of the procedures
19 prescribed by Federal Rules of Civil Procedure 29, 30 (including depositions by remote
20 means), 31, 33, 34, 36, 45, and 69.

21 B. For matters concerning this Order, the Commission is authorized to
22 communicate directly with each Defendant. Defendant must permit representatives of the
23 Commission to interview any employee or other person affiliated with any Defendant
24 who has agreed to such an interview. The person interviewed may have counsel present.

25 C. The Commission may use all other lawful means, including posing, through
26 its representatives as consumers, suppliers, or other individuals or entities, to Defendants
27 or any individual or entity affiliated with Defendants, without the necessity of
28 identification or prior notice. Nothing in this Order limits the Commission's lawful use

1 of compulsory process, pursuant to Sections 9 and 20 of the FTC Act, 15 U.S.C. §§ 49,
2 57b-1.

3 **IX. Additional Provision**

4 IT IS FURTHER ORDERED that no provision of this Order shall apply to any
5 foreign entity, to the extent that its conduct does not fall within the Commission’s
6 jurisdiction, or impose on any Individual Defendant any obligation solely by virtue of
7 their ownership or control of a foreign entity the conduct of which is not subject to the
8 Commission’s jurisdiction.

9 **X. Retention Of Jurisdiction**

10 IT IS FURTHER ORDERED that this Court retains jurisdiction of this matter for
11 purposes of construction, modification, and enforcement of this Order.

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1 **SO STIPULATED AND AGREED:**

2 **FOR PLAINTIFF:**

3 **FEDERAL TRADE COMMISSION**


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Date: 4/13/2026

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16 **FOR DEFENDANTS:**

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Date: 3/6/2026

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26 *COUNSEL for Forever Living Products International, LLC, ForeverLiving.com,*
27 *LLC, Gregg Maughan, and Aidan O'Hare*

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DEFENDANTS: Forever Living Products International, LLC, Forever Living.com, LLC, Gregg Maughan, and Aidan O'Hare

Signed by: 
Date: 3/6/2026
15032FB2A4FF40D...
Gregg Maughan, individually
and as an officer of Forever Living Products International, LLC and Forever Living.com, LLC

Signed by: 
Date: 3/6/2026
C5FE3C739480407...
Aidan O'Hare, individually
and as an officer of Forever Living Products International, LLC and Forever Living.com, LLC

ATTACHMENT A

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Notice to Forever Living Participants

We reached an agreement with the Federal Trade Commission (FTC), the nation’s consumer protection agency, to settle charges that we broke the law by making claims about how much money Forever Living participants could earn without the required proof, and by instructing Forever Living participants to do the same.

Forever Living did not admit or deny the FTC’s allegations, but we reached an agreement with the FTC to settle the lawsuit. We agreed not to make earnings claims without supporting evidence, which must be made available to actual and prospective U.S. Forever Living participants upon request. As a Forever Living participant, you must not make such claims either.

Learn more about the settlement on the FTC’s website.