

Laura Smith
Legal Director
Truth in Advertising
P.O. Box 927
Madison, CT 06443
Via Email and U.S. Mail

October 20, 2017

Re: Zurvita's Compliance for 2017

Dear Ms. Smith,

My name is Erin McGinnis. I am the Director of Compliance for Zurvita, Inc. and Zurvita Holdings, Inc. ("Zurvita"). I am writing to you, today, to provide you with an update on Zurvita's compliance strategies and successes so far, this year! First, please know that Zurvita takes compliance very seriously. I had the pleasure of attending the Direct Selling Compliance Seminar held in Dallas, Texas, in January, 2017, and hearing Bonnie Patten speak. Also in attendance on behalf of Zurvita were Brant Wallace, our Senior Vice President of Strategy and Resources, Angelina Whittington, our outside general counsel, and Kevin Thompson, our compliance counsel. We attended the compliance seminar as part of our ongoing efforts to learn more strategies to assist Zurvita in eradicating any advertising or messaging on the internet that does not truthfully and accurately represent Zurvita's principles, products, and programs. I have summarized below our continuous efforts, and hope that you will publish this letter to demonstrate Zurvita's genuine commitment to Truth in Advertising. You have our express permission to do so.

Specific Identified Claims: Your website included a list of "Zurvita Health Claims Database," identifying statements available on the internet that were deemed a "sampling of inappropriate health claims being made about Zurvita products." In my position as Director of Compliance, I worked with a dedicated team to create a strategy to identify each of those inappropriate health claims and, to the extent possible, to have those inappropriate health claims removed. Your office kindly assisted me with the claimants that I was unable to identify. In fact, your office kindly responded to our counsel's emails and calls numerous times throughout 2017. We appreciate your willingness to assist us. ***We created a comprehensive chart*** with respect to every claim identified by TINA.ORG on its Zurvita Health Claims Database demonstrating our efforts and success at removing each inappropriate health claim. The chart is being included with this letter. We hope that this comprehensive chart is made available on your website to demonstrate our ongoing commitment to police inappropriate health claims being made about Zurvita products and diligent efforts and success in removing them. Out of twenty-seven cases, twenty-three were removed, two cases were connected to inactive Consultants and one case was not located after a thorough investigation.

Self Policing: As further proof of Zurvita's ongoing investment and commitment to removing inappropriate claims, Zurvita interviewed database companies to learn more about software available to help Zurvita track improper claims that may appear on the internet from any source. In 2017, Zurvita purchased Field Watch, a software program designed to assist companies, such as Zurvita, in accessing and monitoring social media content, allowing our compliance team to identify and work to remove improper claims.

Retail Sales: During Patten's presentation, she highlighted the need for companies to focus their energies on generating sales to non-participants (customers). I am proud to state that Zurvita currently generates more than 50% of its sales volume from customers, which exceeds the legal standards that are out there. We feel a focus on customer's leads to a more disciplined and compliant sales force.

Ongoing Commitment to Truth: Not only is Zurvita constantly monitoring the Internet for inappropriate health claims through its compliance team's daily efforts and Field Watch's patented software, but Zurvita is also monitoring any other inappropriate or exaggerated claims about any aspect of the Zurvita experience. Zurvita's founding principles are (1) to build a company that honors and glorifies God; (2) develop a company with humble leadership; (3) create an environment where people can win at every level. We at Zurvita strive to reflect these principles every day and are working hard to make sure all messaging about Zurvita on the internet is both truthful and reflective of our founding principles.

Please call me to discuss any other ideas you and your team may have to assist us in our tireless efforts to reflect the truth.

With warmest regards,

Erin McGinnis

TINA.ORG "Zurvita Health Claims Database" review

Claim	Link from TINA	Social Media Link
Alzheimers_dementia_Facebook	https://www.truthinadvertising.org/wp-content/uploads/2016/07/Alzheimers-dementia_Facebook.pdf	Not Available / Deleted
Arthritis_Skin_Cancer_Youtube	https://www.truthinadvertising.org/wp-content/uploads/2016/07/Arthritis-Skin-Cancer_Youtube.mp4	Not Available / Deleted - Reported to Youtube
Back injury_Health and Wellness Through Nutrition	https://www.truthinadvertising.org/wp-content/uploads/2016/07/Back-injury_Health-and-Wellness-Through-Nutrition.pdf	Not Available / Deleted
Blood pressure_Facebook	https://www.truthinadvertising.org/wp-content/uploads/2016/07/Blood-pressure_Facebook.pdf	Not Available / Deleted
Blood pressure_diabetes_headache_Better and Well	https://www.truthinadvertising.org/wp-content/uploads/2016/07/Blood-pressure-diabetes-headache_Better-and-Well.pdf	Not Available / Deleted
Cancer_Life is a Miracle	https://www.truthinadvertising.org/wp-content/uploads/2016/07/Cancer_Life-is-a-Miracle.pdf	Consultant Inactive
Cancer_Twitter	https://www.truthinadvertising.org/wp-content/uploads/2016/07/Cancer_Twitter.pdf	Not Available / Deleted
Cancer_blood pressure_What Is Zeal For Life	https://www.truthinadvertising.org/wp-content/uploads/2016/07/Cancer-blood-pressure_What-Is-Zeal-For-Life.pdf	Not Available / Deleted
Cancer_diabetes_Facebook	https://www.truthinadvertising.org/wp-content/uploads/2016/07/Cancer-diabetes_Facebook.pdf	Consultant Inactive
Cancer_heart disease_diabetes_plus more_Facebook	https://www.truthinadvertising.org/wp-content/uploads/2016/07/Cancer-heart-disease-diabetes-plus-more_Facebook.pdf	Not Available / Deleted
Chronic's Disease_Thyroid Disorders and More_Zeal for Life	https://www.truthinadvertising.org/wp-content/uploads/2016/07/Chrons-Disease-Thyroid-Disorders-and-More_Zeal-for-Life.pdf	Request Link
Diabetes_Better and Well	https://www.truthinadvertising.org/wp-content/uploads/2016/07/Diabetes_Better-and-Well.pdf	Not Available / Deleted
Diabetes_Youtube	https://www.truthinadvertising.org/wp-content/uploads/2016/07/Diabetes_Youtube.mp4	Not Available / Deleted
Diabetes_Zeal For Life_Drink	https://www.truthinadvertising.org/wp-content/uploads/2016/07/Diabetes_Zeal-For-Life_Drink.pdf	Not Available / Deleted
Diabetes_blood pressure_Facebook	https://www.truthinadvertising.org/wp-content/uploads/2016/07/Diabetes-blood-pressure_Facebook.pdf	Not Available / Deleted
Diabetes2_Facebook	https://www.truthinadvertising.org/wp-content/uploads/2016/07/Diabetes_2_Facebook.pdf	Not Available / Deleted
Diabetes3_Facebook	https://www.truthinadvertising.org/wp-content/uploads/2016/07/Diabetes_3_Facebook.pdf	Not Available / Deleted
Diabetes4_Facebook	https://www.truthinadvertising.org/wp-content/uploads/2016/07/Diabetes_4_Facebook.pdf	Not Available / Deleted
Heart disease_cancer_diabetes_Facebook	https://www.truthinadvertising.org/wp-content/uploads/2016/07/Heart-disease-cancer-diabetes_Facebook.pdf	LaQuita Hambrick is INACTIVE but still continuing to reach out to Facebook to remove page - Page removed.
High blood pressure_diabetes_Twitter	https://www.truthinadvertising.org/wp-content/uploads/2016/07/High-blood-pressure_diabetes_Twitter.pdf	Not Available / Deleted
Insomnia_Arthritis and More_Youtube	https://www.truthinadvertising.org/wp-content/uploads/2016/07/Insomnia-Arthritis-and-More_Youtube.mp4	Reported to YouTube - https://www.youtube.com/watch?v=1g6zA1NTXwY
Lung Function_Youtube	https://www.truthinadvertising.org/wp-content/uploads/2016/07/Lung-Function_Youtube.mp4	Not Available / Deleted
Lupus_Facebook	https://www.truthinadvertising.org/wp-content/uploads/2016/07/Lupus_Facebook.pdf	Not Available / Deleted
Migraines_diabetes_arthritis_Twitter	https://www.truthinadvertising.org/wp-content/uploads/2016/07/Migraines-diabetes-arthritis_Twitter.pdf	Not Available / Deleted
Migraines_Uterine Cancer_and more_Facebook	https://www.truthinadvertising.org/wp-content/uploads/2016/07/Migraines-Uterine-Cancer-and-more_Facebook.pdf	Not Available / Deleted
Stroke_cancer_and more_facebook	https://www.truthinadvertising.org/wp-content/uploads/2016/07/Stroke-cancer-and-more_facebook.pdf	Not Available / Deleted