



Office of the Director
Bureau of Consumer Protection

UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, DC 20580

May 23, 2014

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

Dear Ms. Smith and Ms. Patten:

Thank you for your letter to Bureau Director Jessica Rich regarding Vemma Italia S.r.l and Vemma Nutrition Company. You raise significant concerns that these companies are operating as a pyramid scheme, and you note that Italian authorities have sanctioned Vemma Italia for being a pyramid scheme.

As you know, the Federal Trade Commission works to protect consumers from unfair or deceptive acts and practices. The Commission takes seriously the harm that illegal pyramid schemes have on consumers and it has taken enforcement action against companies operating as pyramid schemes in appropriate cases. In determining whether a particular act or practice warrants enforcement action, the Commission may consider a number of factors, including the type of violation alleged; the nature and amount of consumer injury at issue and the number of consumers affected; and the likelihood of preventing future unlawful conduct. However, a number of statutory provisions and the Commission's Rules of Practice prevent me from discussing what actions, if any, the Commission may take in any particular situation.

We appreciate learning of your concerns, and we appreciate you forwarding us a copy of the Italian decision against Vemma Italia. If you have any questions or concerns, please feel free to contact me at [REDACTED]

Sincerely,

A handwritten signature in cursive script that reads "Laura DeMartino".

Laura DeMartino
Chief of Staff, Bureau of Consumer Protection