



United States of America  
FEDERAL TRADE COMMISSION  
Washington, D.C. 20580

Division of Advertising Practices

July 12, 2016

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

Re: Complaint regarding Nerium International's marketing practices

Dear Ms. Smith and Ms. Patten:

This responds to your July 12, 2016 letter regarding Nerium International's advertising for its multilevel marketing business opportunity, line of skin care products, and "age-defying" supplement. Your letter indicates that TINA.org has compiled over 100 examples of what you believe are unsubstantiated health and disease treatment claims for Nerium's products, including claims that its products can treat, cure, or alleviate symptoms of autism, post-traumatic stress disorder, Alzheimer's, Parkinson's, psoriasis, eczema, acne, rosacea, and other health conditions. Your letter also contends that Nerium and its distributors use deceptive, atypical, and unsubstantiated income claims to encourage consumers to sign-up as product distributors. For example, Nerium advertises that distributors can become millionaires and earn incomes that put them in the top 5% of U.S. income earners. Your letter notes that when TINA.org contacted Nerium last month, the company represented that it would promptly address these issues; however, after more than three weeks, you still did not see any changes to its marketing. Accordingly, you referred this matter to the Commission for our review and requested that we investigate and take action against Nerium for any FTC Act violations.

We will review your submission thoroughly to determine whether Commission action is appropriate and will contact you if we need additional information. We also will forward your complaint to our Consumer Response Center, so that the complaint will be entered into Consumer Sentinel, our secure, online database available to more than 2,000 civil and criminal law enforcement agencies in the U.S. and abroad. Thank you for writing to the Commission.

Very truly yours,

Mary K. Engle  
Associate Director for Advertising Practices

cc: Lois Greisman (via email only)