

Note: Below are copies of all 60 letters sent to DSA member companies (in alphabetical order) alerting them of TINA.org's findings in our health claims investigation.



June 6, 2016

VIA OVERNIGHT MAIL AND EMAIL

Steve Tew, President and CEO
4Life Research, LLC
9850 South 300 West
Sandy, UT 84070
[REDACTED]

Re: Deceptive Marketing for 4Life Research Products

Dear Mr. Tew:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. We have found that your company, 4Life Research, LLC, and its distributors are engaged in a deceptive marketing campaign for 4Life products.

Specifically, 4Life distributors are making a multitude of unsubstantiated disease-treatment claims about the products, such as being able to treat, cure, or alleviate the symptoms of autism, Tourette syndrome, pneumonia, cancer, dengue, diabetes, ADD, Down syndrome, Epstein-Barr virus, epilepsy, HIV/AIDS, heart disease, influenza, leprosy, leukemia, lupus, meningitis, Parkinson's disease, and shingles. A sampling of these types of inappropriate health claims is available at <https://www.truthinadvertising.org/4life-health-claims-database/>.

Based on this information, we intend to notify the Federal Trade Commission that 4Life Research, through its distributors, is engaged in a deceptive marketing campaign unless, by **June 14, 2016**, you show us that 4Life Research has corrected the issues described above, taken steps to ensure that there are no future misrepresentations, and made every effort to alert 4Life customers of these issues.

Sincerely,

A handwritten signature in blue ink that reads "Smith". The signature is written in a cursive style with a large, looped "S" at the beginning.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.



November 22, 2016

VIA REGULAR MAIL

Brian Connolly, Chief Executive Officer
AdvoCare International, LP
2801 Summit Avenue
Plano, TX 75074-7453

Re: AdvoCare International's Deceptive and Illegal Health Claims

Dear Mr. Connolly:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising.

As you may be aware, TINA.org recently investigated 62 MLM companies listed as Direct Selling Association members selling nutritional supplements. Our findings revealed that 60 companies (or 97%) have made or are making – either directly or through their distributors – claims that the companies' products can treat, cure, prevent, alleviate the symptoms of, or reduce the risk of developing diseases or disorders, in violation of the law. See *Is the DSA Ignoring Illegal Health Claims*, available at <https://www.truthinadvertising.org/dsa-ignoring-illegal-health-claims/>.

We found that AdvoCare International is one of the 60 companies at issue. A database containing a small sampling of inappropriate health claims being made can be found here: <https://www.truthinadvertising.org/advocare-health-claims-database/>.

I trust that your company will take immediate action to remove all unsubstantiated and illegal health claims being made, as well as ensure that no future misrepresentations are made.

If you have any questions or need further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc: Joseph Mariano, President, Direct Selling Association
Jared O. Blum, Esq., DSA Code of Ethics Administrator



November 22, 2016

VIA REGULAR MAIL

Glen Jensen, Group CEO
Agel Enterprises, LLC
2174 West Grove Parkway Suite 100
Pleasant Grove, Utah 84062

Re: Agel Enterprises's Deceptive and Illegal Health Claims

Dear Mr. Jensen:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising.

As you may be aware, TINA.org recently investigated 62 MLM companies listed as Direct Selling Association members selling nutritional supplements. Our findings revealed that 60 companies (or 97%) have made or are making – either directly or through their distributors – claims that the companies' products can treat, cure, prevent, alleviate the symptoms of, or reduce the risk of developing diseases or disorders, in violation of the law. See *Is the DSA Ignoring Illegal Health Claims*, available at <https://www.truthinadvertising.org/dsa-ignoring-illegal-health-claims/>.

We found that Agel Enterprise is one of the 60 companies at issue. A database containing a small sampling of inappropriate health claims being made can be found here: <https://www.truthinadvertising.org/agel-health-claims-database/>.

I trust that your company will take immediate action to remove all unsubstantiated and illegal health claims being made, as well as ensure that no future misrepresentations are made.

If you have any questions or need further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc: Joseph Mariano, President, Direct Selling Association
Jared O. Blum, Esq., DSA Code of Ethics Administrator



November 22, 2016

VIA REGULAR MAIL

Michael Mohr, General Counsel
Amway
7575 Fulton Street East
Ada, MI 49355-0001

Re: Amway's Deceptive and Illegal Health Claims

Dear Mr. Mohr:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising.

As you may be aware, TINA.org recently investigated 62 MLM companies listed as Direct Selling Association members selling nutritional supplements. Our findings revealed that 60 companies (or 97%) have made or are making – either directly or through their distributors – claims that the companies' products can treat, cure, prevent, alleviate the symptoms of, or reduce the risk of developing diseases or disorders, in violation of the law. See *Is the DSA Ignoring Illegal Health Claims*, available at <https://www.truthinadvertising.org/dsa-ignoring-illegal-health-claims/>.

We found that Amway is one of the 60 companies at issue. A database containing a small sampling of inappropriate health claims being made can be found here: <https://www.truthinadvertising.org/amway-health-claims-database/>.

I trust that your company will take immediate action to remove all unsubstantiated and illegal health claims being made, as well as ensure that no future misrepresentations are made.

If you have any questions or need further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc: Joseph Mariano, President, Direct Selling Association
Jared O. Blum, Esq., DSA Code of Ethics Administrator



November 22, 2016

VIA REGULAR MAIL

Bernadette Chala, General Counsel
Arbonne
9400 Jeronimo Rd.
Irvine, CA 92618

Re: Arbonne's Deceptive and Illegal Health Claims

Dear Ms. Chala:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising.

As you may be aware, TINA.org recently investigated 62 MLM companies listed as Direct Selling Association members selling nutritional supplements. Our findings revealed that 60 companies (or 97%) have made or are making – either directly or through their distributors – claims that the companies' products can treat, cure, prevent, alleviate the symptoms of, or reduce the risk of developing diseases or disorders, in violation of the law. See *Is the DSA Ignoring Illegal Health Claims*, available at <https://www.truthinadvertising.org/dsa-ignoring-illegal-health-claims/>.

We found that Arbonne is one of the 60 companies at issue. A database containing a small sampling of inappropriate health claims being made can be found here: <https://www.truthinadvertising.org/arbonne-health-claims-database/>.

I trust that your company will take immediate action to remove all unsubstantiated and illegal health claims being made, as well as ensure that no future misrepresentations are made.

If you have any questions or need further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc: Joseph Mariano, President, Direct Selling Association
Jared O. Blum, Esq., DSA Code of Ethics Administrator



November 22, 2016

VIA REGULAR MAIL

Charles W. & Judy Herbster, Owners
Conklin Company, Inc.
3951 NE Kimball Drive
Kansas City, MO 64161

Re: Conklin's Deceptive and Illegal Health Claims

Dear Mr. and Mrs. Herbster:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising.

As you may be aware, TINA.org recently investigated 62 MLM companies listed as Direct Selling Association members selling nutritional supplements. Our findings revealed that 60 companies (or 97%) have made or are making – either directly or through their distributors – claims that the companies' products can treat, cure, prevent, alleviate the symptoms of, or reduce the risk of developing diseases or disorders, in violation of the law. See *Is the DSA Ignoring Illegal Health Claims*, available at <https://www.truthinadvertising.org/dsa-ignoring-illegal-health-claims/>.

We found that Conklin is one of the 60 companies at issue. A database containing a small sampling of inappropriate health claims being made can be found here: <https://www.truthinadvertising.org/conklin-health-claims-database/>.

I trust that your company will take immediate action to remove all unsubstantiated and illegal health claims being made, as well as ensure that no future misrepresentations are made.

If you have any questions or need further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc: Joseph Mariano, President, Direct Selling Association
Jared O. Blum, Esq., DSA Code of Ethics Administrator



November 22, 2016

VIA REGULAR MAIL

Russ Hall, Founder & CEO
Enzacta USA
1712 Pioneer Ave. Ste. 794
Cheyenne, WY 82001

Re: Enzacta's Deceptive and Illegal Health Claims

Dear Mr. Hall:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising.

As you may be aware, TINA.org recently investigated 62 MLM companies listed as Direct Selling Association members selling nutritional supplements. Our findings revealed that 60 companies (or 97%) have made or are making – either directly or through their distributors – claims that the companies' products can treat, cure, prevent, alleviate the symptoms of, or reduce the risk of developing diseases or disorders, in violation of the law. See *Is the DSA Ignoring Illegal Health Claims*, available at <https://www.truthinadvertising.org/dsa-ignoring-illegal-health-claims/>.

We found that Enzacta is one of the 60 companies at issue. A database containing a small sampling of inappropriate health claims being made can be found here: <https://www.truthinadvertising.org/enzacta-health-claims-database/>.

I trust that your company will take immediate action to remove all unsubstantiated and illegal health claims being made, as well as ensure that no future misrepresentations are made.

If you have any questions or need further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc: Joseph Mariano, President, Direct Selling Association
Jared O. Blum, Esq., DSA Code of Ethics Administrator



November 22, 2016

VIA REGULAR MAIL

Don Cotton, Co-Founder & CEO
EXfuze, LLC
4200 Northcorp Parkway, Suite 150
West Palm Beach, FL 33410-4316

Re: EXfuze's Deceptive and Illegal Health Claims

Dear Mr. Cotton:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising.

As you may be aware, TINA.org recently investigated 62 MLM companies listed as Direct Selling Association members selling nutritional supplements. Our findings revealed that 60 companies (or 97%) have made or are making – either directly or through their distributors – claims that the companies' products can treat, cure, prevent, alleviate the symptoms of, or reduce the risk of developing diseases or disorders, in violation of the law. See *Is the DSA Ignoring Illegal Health Claims*, available at <https://www.truthinadvertising.org/dsa-ignoring-illegal-health-claims/>.

We found that EXfuze is one of the 60 companies at issue. A database containing a small sampling of inappropriate health claims being made can be found here: <https://www.truthinadvertising.org/exfuze-health-claims-database/>.

I trust that your company will take immediate action to remove all unsubstantiated and illegal health claims being made, as well as ensure that no future misrepresentations are made.

If you have any questions or need further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc: Joseph Mariano, President, Direct Selling Association
Jared O. Blum, Esq., DSA Code of Ethics Administrator



November 22, 2016

VIA REGULAR MAIL

László Gaál, Founding President, CEO
Flavon USA, LLC
1370 North US 1, Suite 206
Ormond Beach, FL 32174

Re: Flavon USA's Deceptive and Illegal Health Claims

Dear Mr. Gaál:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising.

As you may be aware, TINA.org recently investigated 62 MLM companies listed as Direct Selling Association members selling nutritional supplements. Our findings revealed that 60 companies (or 97%) have made or are making – either directly or through their distributors – claims that the companies' products can treat, cure, prevent, alleviate the symptoms of, or reduce the risk of developing diseases or disorders, in violation of the law. *See* *Is the DSA Ignoring Illegal Health Claims*, available at <https://www.truthinadvertising.org/dsa-ignoring-illegal-health-claims/>.

We found that Flavon USA is one of the 60 companies at issue. A database containing a small sampling of inappropriate health claims being made can be found here: <https://www.truthinadvertising.org/flavon-health-claims-database/>.

I trust that your company will take immediate action to remove all unsubstantiated and illegal health claims being made, as well as ensure that no future misrepresentations are made.

If you have any questions or need further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc: Joseph Mariano, President, Direct Selling Association
Jared O. Blum, Esq., DSA Code of Ethics Administrator



November 22, 2016

VIA REGULAR MAIL

Rex Maughan, CEO
Forever Living Products
7501 East McCormick Parkway, Suite 135 South
Scottsdale, AZ 85258

Re: Forever Living Products' Deceptive and Illegal Health Claims

Dear Mr. Maughan:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising.

As you may be aware, TINA.org recently investigated 62 MLM companies listed as Direct Selling Association members selling nutritional supplements. Our findings revealed that 60 companies (or 97%) have made or are making – either directly or through their distributors – claims that the companies' products can treat, cure, prevent, alleviate the symptoms of, or reduce the risk of developing diseases or disorders, in violation of the law. See *Is the DSA Ignoring Illegal Health Claims*, available at <https://www.truthinadvertising.org/dsa-ignoring-illegal-health-claims/>.

We found that Forever Living Products is one of the 60 companies at issue. A database containing a small sampling of inappropriate health claims being made can be found here: <https://www.truthinadvertising.org/forever-living-health-claims-database/>.

I trust that your company will take immediate action to remove all unsubstantiated and illegal health claims being made, as well as ensure that no future misrepresentations are made.

If you have any questions or need further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc: Joseph Mariano, President, Direct Selling Association
Jared O. Blum, Esq., DSA Code of Ethics Administrator



November 22, 2016

VIA REGULAR MAIL

Ray Faltinsky, CEO & Co-Founder
FreeLife International
4717 East Hilton Avenue, Suite 100
Phoenix, AZ 85034

Re: FreeLife International's Deceptive and Illegal Health Claims

Dear Mr. Faltinsky:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising.

As you may be aware, TINA.org recently investigated 62 MLM companies listed as Direct Selling Association members selling nutritional supplements. Our findings revealed that 60 companies (or 97%) have made or are making – either directly or through their distributors – claims that the companies' products can treat, cure, prevent, alleviate the symptoms of, or reduce the risk of developing diseases or disorders, in violation of the law. See *Is the DSA Ignoring Illegal Health Claims*, available at <https://www.truthinadvertising.org/dsa-ignoring-illegal-health-claims/>.

We found that FreeLife International is one of the 60 companies at issue. A database containing a small sampling of inappropriate health claims being made can be found here: <https://www.truthinadvertising.org/freelife-health-claims-database/>.

I trust that your company will take immediate action to remove all unsubstantiated and illegal health claims being made, as well as ensure that no future misrepresentations are made.

If you have any questions or need further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc: Joseph Mariano, President, Direct Selling Association
Jared O. Blum, Esq., DSA Code of Ethics Administrator



November 22, 2016

VIA REGULAR MAIL

Chief Executive Officer/President
Gano Excel USA, Inc.
4828 Fourth Street
Irwindale, CA 91706

Re: Gano Excel's Deceptive and Illegal Health Claims

Dear Sir or Madam:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising.

As you may be aware, TINA.org recently investigated 62 MLM companies listed as Direct Selling Association members selling nutritional supplements. Our findings revealed that 60 companies (or 97%) have made or are making – either directly or through their distributors – claims that the companies' products can treat, cure, prevent, alleviate the symptoms of, or reduce the risk of developing diseases or disorders, in violation of the law. *See* *Is the DSA Ignoring Illegal Health Claims*, available at <https://www.truthinadvertising.org/dsa-ignoring-illegal-health-claims/>.

We found that Gano Excel is one of the 60 companies at issue. A database containing a small sampling of inappropriate health claims being made can be found here: <https://www.truthinadvertising.org/gano-excel-usa-health-claims-database/>.

I trust that your company will take immediate action to remove all unsubstantiated and illegal health claims being made, as well as ensure that no future misrepresentations are made.

If you have any questions or need further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc: Joseph Mariano, President, Direct Selling Association
Jared O. Blum, Esq., DSA Code of Ethics Administrator



November 22, 2016

VIA REGULAR MAIL

Kendra Brassfield, CEO
GNLD International
3500 Gateway Boulevard
Fremont, CA 94538-6584

Re: GNLD International's Deceptive and Illegal Health Claims

Dear Ms. Brassfield:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising.

As you may be aware, TINA.org recently investigated 62 MLM companies listed as Direct Selling Association members selling nutritional supplements. Our findings revealed that 60 companies (or 97%) have made or are making – either directly or through their distributors – claims that the companies' products can treat, cure, prevent, alleviate the symptoms of, or reduce the risk of developing diseases or disorders, in violation of the law. See *Is the DSA Ignoring Illegal Health Claims*, available at <https://www.truthinadvertising.org/dsa-ignoring-illegal-health-claims/>.

We found that GNLD International is one of the 60 companies at issue. A database containing a small sampling of inappropriate health claims being made can be found here: <https://www.truthinadvertising.org/gnld-international-health-claims-database/>.

I trust that your company will take immediate action to remove all unsubstantiated and illegal health claims being made, as well as ensure that no future misrepresentations are made.

If you have any questions or need further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc: Joseph Mariano, President, Direct Selling Association
Jared O. Blum, Esq., DSA Code of Ethics Administrator



November 22, 2016

VIA REGULAR MAIL

Michael O. Johnson, CEO
Herbalife
800 West Olympic Boulevard, Suite 406
Los Angeles, CA 90015-1367

Re: Herbalife's Deceptive and Illegal Health Claims

Dear Mr. Johnson:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising.

As you may be aware, TINA.org recently investigated 62 MLM companies listed as Direct Selling Association members selling nutritional supplements. Our findings revealed that 60 companies (or 97%) have made or are making – either directly or through their distributors – claims that the companies' products can treat, cure, prevent, alleviate the symptoms of, or reduce the risk of developing diseases or disorders, in violation of the law. See *Is the DSA Ignoring Illegal Health Claims*, available at <https://www.truthinadvertising.org/dsa-ignoring-illegal-health-claims/>.

We found that Herbalife is one of the 60 companies at issue. A database containing a small sampling of inappropriate health claims being made can be found here: <https://www.truthinadvertising.org/herbalife-health-claims-database/>.

I trust that your company will take immediate action to remove all unsubstantiated and illegal health claims being made, as well as ensure that no future misrepresentations are made.

If you have any questions or need further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc: Joseph Mariano, President, Direct Selling Association
Jared O. Blum, Esq., DSA Code of Ethics Administrator



November 22, 2016

VIA REGULAR MAIL

Charles L. Orr, CEO
Immunotec, Inc.
300 Joseph-Carrier
Vaudreuil-Dorion, Quebec J7V 5V5, CANADA

Re: Immunotec, Inc.'s Deceptive and Illegal Health Claims

Dear Mr. Orr:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising.

As you may be aware, TINA.org recently investigated 62 MLM companies listed as Direct Selling Association members selling nutritional supplements. Our findings revealed that 60 companies (or 97%) have made or are making – either directly or through their distributors – claims that the companies' products can treat, cure, prevent, alleviate the symptoms of, or reduce the risk of developing diseases or disorders, in violation of the law. See *Is the DSA Ignoring Illegal Health Claims*, available at <https://www.truthinadvertising.org/dsa-ignoring-illegal-health-claims/>.

We found that Immunotec is one of the 60 companies at issue. A database containing a small sampling of inappropriate health claims being made can be found here: <https://www.truthinadvertising.org/immunotec-health-claims-database/>.

I trust that your company will take immediate action to remove all unsubstantiated and illegal health claims being made, as well as ensure that no future misrepresentations are made.

If you have any questions or need further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc: Joseph Mariano, President, Direct Selling Association
Jared O. Blum, Esq., DSA Code of Ethics Administrator



November 22, 2016

VIA REGULAR MAIL

Jim Coover, Co-Founder & CEO
Isagenix International
155 E. Rivulon Boulevard, LLC
Gilbert, AZ 85297

Re: Isagenix International's Deceptive and Illegal Health Claims

Dear Mr. Coover:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising.

As you may be aware, TINA.org recently investigated 62 MLM companies listed as Direct Selling Association members selling nutritional supplements. Our findings revealed that 60 companies (or 97%) have made or are making – either directly or through their distributors – claims that the companies' products can treat, cure, prevent, alleviate the symptoms of, or reduce the risk of developing diseases or disorders, in violation of the law. *See* Is the DSA Ignoring Illegal Health Claims, available at <https://www.truthinadvertising.org/dsa-ignoring-illegal-health-claims/>.

We found that Isagenix International is one of the 60 companies at issue. A database containing a small sampling of inappropriate health claims being made can be found here: <https://www.truthinadvertising.org/isagenix-health-claims-database/>.

I trust that your company will take immediate action to remove all unsubstantiated and illegal health claims being made, as well as ensure that no future misrepresentations are made.

If you have any questions or need further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc: Joseph Mariano, President, Direct Selling Association
Jared O. Blum, Esq., DSA Code of Ethics Administrator



September 25, 2015

VIA EMAIL AND OVERNIGHT MAIL

Randy Ray, Chief Executive Officer
Rob Dawson, Chief Legal Officer
Mark Patterson, Chief Marketing Officer
Jeunesse Global, LLC
650 Douglas Avenue
Altamonte Springs, FL 32714



Re: Deceptive Marketing for Jeunesse Business Opportunity and Products

Dear Mr. Ray, Mr. Dawson, and Mr. Patterson:

I am writing to you on behalf of Truth in Advertising, Inc. (“TINA.org”), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. We have found that your company, Jeunesse Global, LLC, and its distributors are engaged in a deceptive marketing campaign for the Jeunesse business opportunity and product lines.

Specifically, Jeunesse and its distributors are using deceptive income claims regarding the financial gains consumers will achieve by becoming distributors. For example, Jeunesse advertises that those who sign-up for its business opportunity can make over \$26,000 per week without clearly and conspicuously providing adequate income disclosures. Its distributors also make unrealistic financial promises, such as being able to make millions of dollars a year, again without clearly and conspicuously providing appropriate income disclosures.

TINA.org also found that Jeunesse distributors have been using a multitude of unsubstantiated health and treatment claims about Jeunesse products, such as being able to cure cancer and other serious illnesses, in order to market the Jeunesse business and its product lines.

Based on this information, we intend to notify the Federal Trade Commission that Jeunesse and its distributors are engaged in a deceptive marketing campaign unless, by **October 2,**

2015, you show us that you have fully corrected the issues described above, have taken steps to ensure that there are no future misrepresentations, and have made every effort to alert Jeunesse customers of these issues.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith". The signature is written in a cursive, flowing style.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.



November 22, 2016

VIA REGULAR MAIL

Jay Martin, CEO
The Juice Plus+ Company, LLC
140 Crescent Drive
Collierville, TN 38017-3374

Re: The Juice Plus+ Company's Deceptive and Illegal Health Claims

Dear Mr. Martin:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising.

As you may be aware, TINA.org recently investigated 62 MLM companies listed as Direct Selling Association members selling nutritional supplements. Our findings revealed that 60 companies (or 97%) have made or are making – either directly or through their distributors – claims that the companies' products can treat, cure, prevent, alleviate the symptoms of, or reduce the risk of developing diseases or disorders, in violation of the law. See *Is the DSA Ignoring Illegal Health Claims*, available at <https://www.truthinadvertising.org/dsa-ignoring-illegal-health-claims/>.

We found that The Juice Plus+ Company is one of the 60 companies at issue. A database containing a small sampling of inappropriate health claims being made can be found here: <https://www.truthinadvertising.org/the-juice-plus-company-health-claims-database/>.

I trust that your company will take immediate action to remove all unsubstantiated and illegal health claims being made, as well as ensure that no future misrepresentations are made.

If you have any questions or need further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc: Joseph Mariano, President, Direct Selling Association
Jared O. Blum, Esq., DSA Code of Ethics Administrator



June 6, 2016

VIA OVERNIGHT MAIL AND EMAIL

Asma Ishaq, Co-Founder and President
Jusuru International, Inc.
1240 North Red Gum Street
Anaheim, CA 92806-1820
[REDACTED]

Re: Deceptive Marketing for Jusuru International Opportunity and Products

Dear Ms. Ishaq:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. We have found that your company, Jusuru International, and its distributors are engaged in a deceptive marketing campaign for the Jusuru business opportunity and product lines.

Specifically, Jusuru distributors are making a multitude of unsubstantiated disease-treatment claims about Jusuru products, such as being able to treat, cure, or alleviate the symptoms of rheumatoid arthritis, osteoarthritis, neuropathy, cancer, psoriasis, diabetes, fibromyalgia, and sciatica. A sampling of these types of inappropriate health claims is available at <https://www.truthinadvertising.org/jusuru-health-claims-database/>.

TINA.org also found that Jusuru and its distributors are using deceptive income claims regarding the financial gains consumers will achieve by becoming distributors. For example, Jusuru advertises that its distributors can make a significant income and get a fully paid-for Mercedes Benz. Not only are such results not typical, but the marketing claims that boast atypical results are made without clearly and conspicuously providing appropriate income disclosures. A sampling of these types of inappropriate income claims is available at <https://www.truthinadvertising.org/jusuru-income-claims-database/>.

Based on this information, we intend to notify the Federal Trade Commission that Jusuru International and its distributors are engaged in a deceptive marketing campaign unless, by **June 14, 2016**, you show us that you have corrected the issues described above, taken steps to ensure that there are no future misrepresentations, and made every effort to alert Jusuru customers of these issues.

Sincerely,

A handwritten signature in blue ink that reads "Smith". The signature is written in a cursive style with a large, looped "S" and a small "i" above the "m".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.



March 28, 2016

VIA OVERNIGHT MAIL AND EMAIL

Michael Breshears, Chief Executive Officer
Scott Seedall, General Counsel
Kyani, Inc.
1070 Riverwalk Dr, Suite 350
Idaho Falls, ID 83402



Re: Deceptive Marketing for Kyani Business Opportunity and Products

Dear Mr. Breshears and Mr. Seedall:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising. We have found that your company, Kyani, Inc., and its distributors are engaged in a deceptive marketing campaign for the Kyani business opportunity and product lines.

Specifically, Kyani distributors are making a multitude of unsubstantiated disease-treatment claims about Kyani products, such as being able to treat, cure, or alleviate the symptoms of cancer, diabetes, fibromyalgia, arthritis, anxiety, autism, ADHD, migraines, gout, insomnia, shingles, lupus, multiple sclerosis, post-traumatic stress disorder, and a host of other medical ailments. The company and the members of its Scientific Advisory Board also make unsubstantiated health claims and frequently highlight that the name Kyani means "strong medicine" in Native Alaskan, sometimes even suggesting that the product can, and should, replace prescription medications.

TINA.org also found that Kyani and its distributors are using deceptive income claims regarding the financial gains consumers will achieve by becoming distributors. For example, Kyani advertises that it "offers the most aggressive, most lucrative compensation plan in the industry," and its distributors make a host of unrealistic financial promises, ranging from getting a company car to making millions of dollars. Not only are such results not typical, but the marketing claims that boast such atypical results are made without clearly and conspicuously providing appropriate income disclosures.

Based on this information, we intend to notify the Federal Trade Commission that Kyani and its distributors are engaged in a deceptive marketing campaign unless, by **April 4, 2016**, you show us that you have fully corrected the issues described above, have taken steps to ensure that there are no future misrepresentations, and have made every effort to alert Kyani customers of these issues.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith". The signature is written in a cursive, flowing style.

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.
lsmith@truthinadvertising.org



November 22, 2016

VIA REGULAR MAIL

Linda and Brian Kaminski, Founders
L'Bri Pure n' Natural
909 Perkins Drive
Mukwonago, WI 53149

Re: L'Bri Pure n' Natural's Deceptive and Illegal Health Claims

Dear Mr. and Mrs. Kaminski:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising.

As you may be aware, TINA.org recently investigated 62 MLM companies listed as Direct Selling Association members selling nutritional supplements. Our findings revealed that 60 companies (or 97%) have made or are making – either directly or through their distributors – claims that the companies' products can treat, cure, prevent, alleviate the symptoms of, or reduce the risk of developing diseases or disorders, in violation of the law. See *Is the DSA Ignoring Illegal Health Claims*, available at <https://www.truthinadvertising.org/dsa-ignoring-illegal-health-claims/>.

We found that L'Bri Pure n' Natural is one of the 60 companies at issue. A database containing a small sampling of inappropriate health claims being made can be found here: <https://www.truthinadvertising.org/lbri-health-claims-database/>.

I trust that your company will take immediate action to remove all unsubstantiated and illegal health claims being made, as well as ensure that no future misrepresentations are made.

If you have any questions or need further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc: Joseph Mariano, President, Direct Selling Association
Jared O. Blum, Esq., DSA Code of Ethics Administrator



November 22, 2016

VIA REGULAR MAIL

David DeBora, CEO
Lifestyles USA
8100 Keele Street
Vaughan, Ontario L4K 2A3, CANADA

Re: Lifestyles USA's Deceptive and Illegal Health Claims

Dear Mr. DeBora:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising.

As you may be aware, TINA.org recently investigated 62 MLM companies listed as Direct Selling Association members selling nutritional supplements. Our findings revealed that 60 companies (or 97%) have made or are making – either directly or through their distributors – claims that the companies' products can treat, cure, prevent, alleviate the symptoms of, or reduce the risk of developing diseases or disorders, in violation of the law. See *Is the DSA Ignoring Illegal Health Claims*, available at <https://www.truthinadvertising.org/dsa-ignoring-illegal-health-claims/>.

We found that Lifestyles USA is one of the 60 companies at issue. A database containing a small sampling of inappropriate health claims being made can be found here: <https://www.truthinadvertising.org/lifestyles-health-claims-database/>.

I trust that your company will take immediate action to remove all unsubstantiated and illegal health claims being made, as well as ensure that no future misrepresentations are made.

If you have any questions or need further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc: Joseph Mariano, President, Direct Selling Association
Jared O. Blum, Esq., DSA Code of Ethics Administrator



November 22, 2016

VIA REGULAR MAIL

Darren Jensen, CEO
LifeVantage Corporation
9785 S. Monroe Street, Suite 300
Sandy, UT 84070

Re: LifeVantage Corporation's Deceptive and Illegal Health Claims

Dear Mr. Jensen:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising.

As you may be aware, TINA.org recently investigated 62 MLM companies listed as Direct Selling Association members selling nutritional supplements. Our findings revealed that 60 companies (or 97%) have made or are making – either directly or through their distributors – claims that the companies' products can treat, cure, prevent, alleviate the symptoms of, or reduce the risk of developing diseases or disorders, in violation of the law. See *Is the DSA Ignoring Illegal Health Claims*, available at <https://www.truthinadvertising.org/dsa-ignoring-illegal-health-claims/>.

We found that LifeVantage Corporation is one of the 60 companies at issue. A database containing a small sampling of inappropriate health claims being made can be found here: <https://www.truthinadvertising.org/lifevantage-health-claims-database/>.

I trust that your company will take immediate action to remove all unsubstantiated and illegal health claims being made, as well as ensure that no future misrepresentations are made.

If you have any questions or need further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc: Joseph Mariano, President, Direct Selling Association
Jared O. Blum, Esq., DSA Code of Ethics Administrator



November 22, 2016

VIA REGULAR MAIL

David Schmidt, Founder & CEO
LifeWave, Inc.
9775 Businesspark Avenue
San Diego, CA 92131-1651

Re: LifeWave, Inc.'s Deceptive and Illegal Health Claims

Dear Mr. Schmidt:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising.

As you may be aware, TINA.org recently investigated 62 MLM companies listed as Direct Selling Association members selling nutritional supplements. Our findings revealed that 60 companies (or 97%) have made or are making – either directly or through their distributors – claims that the companies' products can treat, cure, prevent, alleviate the symptoms of, or reduce the risk of developing diseases or disorders, in violation of the law. See *Is the DSA Ignoring Illegal Health Claims*, available at <https://www.truthinadvertising.org/dsa-ignoring-illegal-health-claims/>.

We found that LifeWave, Inc. is one of the 60 companies at issue. A database containing a small sampling of inappropriate health claims being made can be found here: <https://www.truthinadvertising.org/lifewave-health-claims-database/>.

I trust that your company will take immediate action to remove all unsubstantiated and illegal health claims being made, as well as ensure that no future misrepresentations are made.

If you have any questions or need further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc: Joseph Mariano, President, Direct Selling Association
Jared O. Blum, Esq., DSA Code of Ethics Administrator



November 22, 2016

VIA REGULAR MAIL

Gary J. Raser, Founder, President and CEO
The Limu Company, LLC
610 Crescent Executive Court, Suite 110
Lake Mary, FL 32746-2111

Re: The Limu Company's Deceptive and Illegal Health Claims

Dear Mr. Raser:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising.

As you may be aware, TINA.org recently investigated 62 MLM companies listed as Direct Selling Association members selling nutritional supplements. Our findings revealed that 60 companies (or 97%) have made or are making – either directly or through their distributors – claims that the companies' products can treat, cure, prevent, alleviate the symptoms of, or reduce the risk of developing diseases or disorders, in violation of the law. See *Is the DSA Ignoring Illegal Health Claims*, available at <https://www.truthinadvertising.org/dsa-ignoring-illegal-health-claims/>.

We found that The Limu Company is one of the 60 companies at issue. A database containing a small sampling of inappropriate health claims being made can be found here: <https://www.truthinadvertising.org/limu-health-claims-database/>.

I trust that your company will take immediate action to remove all unsubstantiated and illegal health claims being made, as well as ensure that no future misrepresentations are made.

If you have any questions or need further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc: Joseph Mariano, President, Direct Selling Association
Jared O. Blum, Esq., DSA Code of Ethics Administrator



November 22, 2016

VIA REGULAR MAIL

Alfredo Bala, CEO and President
Mannatech, Inc.
600 South Royal Lane, Suite 200
Coppell, TX 75019-3823

Re: Mannatech, Inc.'s Deceptive and Illegal Health Claims

Dear Mr. Bala:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising.

As you may be aware, TINA.org recently investigated 62 MLM companies listed as Direct Selling Association members selling nutritional supplements. Our findings revealed that 60 companies (or 97%) have made or are making – either directly or through their distributors – claims that the companies' products can treat, cure, prevent, alleviate the symptoms of, or reduce the risk of developing diseases or disorders, in violation of the law. See *Is the DSA Ignoring Illegal Health Claims*, available at <https://www.truthinadvertising.org/dsa-ignoring-illegal-health-claims/>.

We found that Mannatech, Inc. is one of the 60 companies at issue. A database containing a small sampling of inappropriate health claims being made can be found here: <https://www.truthinadvertising.org/mannatech-health-claims-database/>.

I trust that your company will take immediate action to remove all unsubstantiated and illegal health claims being made, as well as ensure that no future misrepresentations are made.

If you have any questions or need further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc: Joseph Mariano, President, Direct Selling Association
Jared O. Blum, Esq., DSA Code of Ethics Administrator



November 22, 2016

VIA REGULAR MAIL

Frank L. VanderSloot, CEO
Melaleuca, Inc.
4609 W. 65th S.
Idaho Falls, ID 83402

Re: Melaleuca's Deceptive and Illegal Health Claims

Dear Mr. VanderSloot:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising.

As you may be aware, TINA.org recently investigated 62 MLM companies listed as Direct Selling Association members selling nutritional supplements. Our findings revealed that 60 companies (or 97%) have made or are making – either directly or through their distributors – claims that the companies' products can treat, cure, prevent, alleviate the symptoms of, or reduce the risk of developing diseases or disorders, in violation of the law. See *Is the DSA Ignoring Illegal Health Claims*, available at <https://www.truthinadvertising.org/dsa-ignoring-illegal-health-claims/>.

We found that Melaleuca is one of the 60 companies at issue. A database containing a small sampling of inappropriate health claims being made can be found here: <https://www.truthinadvertising.org/melaleuca-health-claims-database/>.

I trust that your company will take immediate action to remove all unsubstantiated and illegal health claims being made, as well as ensure that no future misrepresentations are made.

If you have any questions or need further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc: Joseph Mariano, President, Direct Selling Association
Jared O. Blum, Esq., DSA Code of Ethics Administrator



November 22, 2016

VIA REGULAR MAIL

Robert S. Conlee, CEO
Modere USA
588 S 2000 W
Springville, UT 84663

Re: Modere USA's Deceptive and Illegal Health Claims

Dear Mr. Conlee:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising.

As you may be aware, TINA.org recently investigated 62 MLM companies listed as Direct Selling Association members selling nutritional supplements. Our findings revealed that 60 companies (or 97%) have made or are making – either directly or through their distributors – claims that the companies' products can treat, cure, prevent, alleviate the symptoms of, or reduce the risk of developing diseases or disorders, in violation of the law. *See* *Is the DSA Ignoring Illegal Health Claims*, available at <https://www.truthinadvertising.org/dsa-ignoring-illegal-health-claims/>.

We found that Modere USA is one of the 60 companies at issue. A database containing a small sampling of inappropriate health claims being made can be found here: <https://www.truthinadvertising.org/modere-health-claims-database/>.

I trust that your company will take immediate action to remove all unsubstantiated and illegal health claims being made, as well as ensure that no future misrepresentations are made.

If you have any questions or need further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc: Joseph Mariano, President, Direct Selling Association
Jared O. Blum, Esq., DSA Code of Ethics Administrator



November 22, 2016

VIA REGULAR MAIL

Kerry Asay, Founder, CEO and President
Morinda, Inc.
737 East 1180 South
American Fork, UT 84003

Re: Morinda, Inc.'s Deceptive and Illegal Health Claims

Dear M. Asay:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising.

As you may be aware, TINA.org recently investigated 62 MLM companies listed as Direct Selling Association members selling nutritional supplements. Our findings revealed that 60 companies (or 97%) have made or are making – either directly or through their distributors – claims that the companies' products can treat, cure, prevent, alleviate the symptoms of, or reduce the risk of developing diseases or disorders, in violation of the law. See *Is the DSA Ignoring Illegal Health Claims*, available at <https://www.truthinadvertising.org/dsa-ignoring-illegal-health-claims/>.

We found that Morinda, Inc. is one of the 60 companies at issue. A database containing a small sampling of inappropriate health claims being made can be found here: <https://www.truthinadvertising.org/morinda-health-claims-database/>.

I trust that your company will take immediate action to remove all unsubstantiated and illegal health claims being made, as well as ensure that no future misrepresentations are made.

If you have any questions or need further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc: Joseph Mariano, President, Direct Selling Association
Jared O. Blum, Esq., DSA Code of Ethics Administrator



November 22, 2016

VIA REGULAR MAIL

Gregory L. Probert, Chairman & CEO
Nature's Sunshine Products, Inc.
2500 West Executive Parkway, Suite 100
Lehi, UT 84043

Re: Nature's Sunshine Products' Deceptive and Illegal Health Claims

Dear Mr. Probert:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising.

As you may be aware, TINA.org recently investigated 62 MLM companies listed as Direct Selling Association members selling nutritional supplements. Our findings revealed that 60 companies (or 97%) have made or are making – either directly or through their distributors – claims that the companies' products can treat, cure, prevent, alleviate the symptoms of, or reduce the risk of developing diseases or disorders, in violation of the law. See *Is the DSA Ignoring Illegal Health Claims*, available at <https://www.truthinadvertising.org/dsa-ignoring-illegal-health-claims/>.

We found that Nature's Sunshine Products is one of the 60 companies at issue. A database containing a small sampling of inappropriate health claims being made can be found here: <https://www.truthinadvertising.org/natures-sunshine-health-claims-database/>.

I trust that your company will take immediate action to remove all unsubstantiated and illegal health claims being made, as well as ensure that no future misrepresentations are made.

If you have any questions or need further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc: Joseph Mariano, President, Direct Selling Association
Jared O. Blum, Esq., DSA Code of Ethics Administrator



November 22, 2016

VIA REGULAR MAIL

Chief Executive Officer/President
Nefful U.S.A., Inc.
18563 East Gale Avenue
City of Industry, CA 91748-1339

Re: Nefful U.S.A., Inc.'s Deceptive and Illegal Health Claims

Dear Sir or Madam:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising.

As you may be aware, TINA.org recently investigated 62 MLM companies listed as Direct Selling Association members selling nutritional supplements. Our findings revealed that 60 companies (or 97%) have made or are making – either directly or through their distributors – claims that the companies' products can treat, cure, prevent, alleviate the symptoms of, or reduce the risk of developing diseases or disorders, in violation of the law. See *Is the DSA Ignoring Illegal Health Claims*, available at <https://www.truthinadvertising.org/dsa-ignoring-illegal-health-claims/>.

We found that Nefful U.S.A. is one of the 60 companies at issue. A database containing a small sampling of inappropriate health claims being made can be found here: <https://www.truthinadvertising.org/nefful-health-claims-database/>.

I trust that your company will take immediate action to remove all unsubstantiated and illegal health claims being made, as well as ensure that no future misrepresentations are made.

If you have any questions or need further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc: Joseph Mariano, President, Direct Selling Association
Jared O. Blum, Esq., DSA Code of Ethics Administrator



November 22, 2016

VIA REGULAR MAIL

Bilal Ruknudeen, CEO
New Earth
P.O. Box 609
Klamath Falls, OR 97601-0329

Re: New Earth's Deceptive and Illegal Health Claims

Dear M. Ruknudeen:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising.

As you may be aware, TINA.org recently investigated 62 MLM companies listed as Direct Selling Association members selling nutritional supplements. Our findings revealed that 60 companies (or 97%) have made or are making – either directly or through their distributors – claims that the companies' products can treat, cure, prevent, alleviate the symptoms of, or reduce the risk of developing diseases or disorders, in violation of the law. See *Is the DSA Ignoring Illegal Health Claims*, available at <https://www.truthinadvertising.org/dsa-ignoring-illegal-health-claims/>.

We found that New Earth is one of the 60 companies at issue. A database containing a small sampling of inappropriate health claims being made can be found here: <https://www.truthinadvertising.org/new-earth-health-claims-database/>.

I trust that your company will take immediate action to remove all unsubstantiated and illegal health claims being made, as well as ensure that no future misrepresentations are made.

If you have any questions or need further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc: Joseph Mariano, President, Direct Selling Association
Jared O. Blum, Esq., DSA Code of Ethics Administrator



November 22, 2016

VIA REGULAR MAIL

Chris Sharnq, President
NHT Global, Inc.
609 Deep Valley Drive, Suite 395
Rolling Hill Estates, CA 90274-3629

Re: NHT Global, Inc.'s Deceptive and Illegal Health Claims

Dear Mr. Sharnq:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising.

As you may be aware, TINA.org recently investigated 62 MLM companies listed as Direct Selling Association members selling nutritional supplements. Our findings revealed that 60 companies (or 97%) have made or are making – either directly or through their distributors – claims that the companies' products can treat, cure, prevent, alleviate the symptoms of, or reduce the risk of developing diseases or disorders, in violation of the law. See *Is the DSA Ignoring Illegal Health Claims*, available at <https://www.truthinadvertising.org/dsa-ignoring-illegal-health-claims/>.

We found that NHT Global is one of the 60 companies at issue. A database containing a small sampling of inappropriate health claims being made can be found here: <https://www.truthinadvertising.org/nht-global-health-claims-database/>.

I trust that your company will take immediate action to remove all unsubstantiated and illegal health claims being made, as well as ensure that no future misrepresentations are made.

If you have any questions or need further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc: Joseph Mariano, President, Direct Selling Association
Jared O. Blum, Esq., DSA Code of Ethics Administrator



November 22, 2016

VIA REGULAR MAIL

Kurt H. Fulle, CEO
Nikken, Inc.
2 Corporate Park, Suite 200
Irvine, CA 92606

Re: Nikken, Inc.'s Deceptive and Illegal Health Claims

Dear Mr. Fulle:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising.

As you may be aware, TINA.org recently investigated 62 MLM companies listed as Direct Selling Association members selling nutritional supplements. Our findings revealed that 60 companies (or 97%) have made or are making – either directly or through their distributors – claims that the companies' products can treat, cure, prevent, alleviate the symptoms of, or reduce the risk of developing diseases or disorders, in violation of the law. See *Is the DSA Ignoring Illegal Health Claims*, available at <https://www.truthinadvertising.org/dsa-ignoring-illegal-health-claims/>.

We found that Nikken is one of the 60 companies at issue. A database containing a small sampling of inappropriate health claims being made can be found here: <https://www.truthinadvertising.org/nikken-health-claims-database/>.

I trust that your company will take immediate action to remove all unsubstantiated and illegal health claims being made, as well as ensure that no future misrepresentations are made.

If you have any questions or need further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc: Joseph Mariano, President, Direct Selling Association
Jared O. Blum, Esq., DSA Code of Ethics Administrator



November 22, 2016

VIA REGULAR MAIL

Takashi Okura, CEO of Noevir Co., Ltd.
Noevir USA, Inc.
1095 Main Street
Irvine, CA 92614-6715

Re: Noevir USA, Inc.'s Deceptive and Illegal Health Claims

Dear M. Okura:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising.

As you may be aware, TINA.org recently investigated 62 MLM companies listed as Direct Selling Association members selling nutritional supplements. Our findings revealed that 60 companies (or 97%) have made or are making – either directly or through their distributors – claims that the companies' products can treat, cure, prevent, alleviate the symptoms of, or reduce the risk of developing diseases or disorders, in violation of the law. See *Is the DSA Ignoring Illegal Health Claims*, available at <https://www.truthinadvertising.org/dsa-ignoring-illegal-health-claims/>.

We found that Noevir USA is one of the 60 companies at issue. A database containing a small sampling of inappropriate health claims being made can be found here: <https://www.truthinadvertising.org/noevir-health-claims-database/>.

I trust that your company will take immediate action to remove all unsubstantiated and illegal health claims being made, as well as ensure that no future misrepresentations are made.

If you have any questions or need further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc: Joseph Mariano, President, Direct Selling Association
Jared O. Blum, Esq., DSA Code of Ethics Administrator



November 22, 2016

VIA REGULAR MAIL

Truman Hunt, President, CEO
Nu Skin Enterprises & Pharmanex
75 West Center Street
Provo, UT 84601

Re: Nu Skin's and Pharmanex's Deceptive and Illegal Health Claims

Dear Mr. Hunt:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising.

As you may be aware, TINA.org recently investigated 62 MLM companies listed as Direct Selling Association members selling nutritional supplements. Our findings revealed that 60 companies (or 97%) have made or are making – either directly or through their distributors – claims that the companies' products can treat, cure, prevent, alleviate the symptoms of, or reduce the risk of developing diseases or disorders, in violation of the law. *See* *Is the DSA Ignoring Illegal Health Claims*, available at <https://www.truthinadvertising.org/dsa-ignoring-illegal-health-claims/>.

We found that Nu Skin and Pharmanex are two of the 60 companies at issue. Databases containing small samplings of inappropriate health claims being made can be found here: <https://www.truthinadvertising.org/nuskin-health-claims-database/> and <https://www.truthinadvertising.org/pharmanex-health-claims-database/>.

I trust that your company will take immediate action to remove all unsubstantiated and illegal health claims being made, as well as ensure that no future misrepresentations are made.

If you have any questions or need further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc: Joseph Mariano, President, Direct Selling Association
Jared O. Blum, Esq., DSA Code of Ethics Administrator



November 22, 2016

VIA REGULAR MAIL

Karen Conkey, President
NYR Organic
One Concord Farms, 490 Virginia Road
Concord, MA 01742

Re: NYR Organic's Deceptive and Illegal Health Claims

Dear Ms. Conkey:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising.

As you may be aware, TINA.org recently investigated 62 MLM companies listed as Direct Selling Association members selling nutritional supplements. Our findings revealed that 60 companies (or 97%) have made or are making – either directly or through their distributors – claims that the companies' products can treat, cure, prevent, alleviate the symptoms of, or reduce the risk of developing diseases or disorders, in violation of the law. See *Is the DSA Ignoring Illegal Health Claims*, available at <https://www.truthinadvertising.org/dsa-ignoring-illegal-health-claims/>.

We found that NYR Organic is one of the 60 companies at issue. A database containing a small sampling of inappropriate health claims being made can be found here: <https://www.truthinadvertising.org/nyr-organic-health-claims-database/>.

I trust that your company will take immediate action to remove all unsubstantiated and illegal health claims being made, as well as ensure that no future misrepresentations are made.

If you have any questions or need further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc: Joseph Mariano, President, Direct Selling Association
Jared O. Blum, Esq., DSA Code of Ethics Administrator



November 22, 2016

VIA REGULAR MAIL

Rolf Sorg, Founder and CEO
PM-International Nutrition and Cosmetics
1012-F Corporate Lane
Export, PA 15632

Re: PM-International's Deceptive and Illegal Health Claims

Dear Mr. Sorg:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising.

As you may be aware, TINA.org recently investigated 62 MLM companies listed as Direct Selling Association members selling nutritional supplements. Our findings revealed that 60 companies (or 97%) have made or are making – either directly or through their distributors – claims that the companies' products can treat, cure, prevent, alleviate the symptoms of, or reduce the risk of developing diseases or disorders, in violation of the law. See *Is the DSA Ignoring Illegal Health Claims*, available at <https://www.truthinadvertising.org/dsa-ignoring-illegal-health-claims/>.

We found that PM-International is one of the 60 companies at issue. A database containing a small sampling of inappropriate health claims being made can be found here: <https://www.truthinadvertising.org/pm-international-health-claims-database/>.

I trust that your company will take immediate action to remove all unsubstantiated and illegal health claims being made, as well as ensure that no future misrepresentations are made.

If you have any questions or need further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc: Joseph Mariano, President, Direct Selling Association
Jared O. Blum, Esq., DSA Code of Ethics Administrator



November 22, 2016

VIA REGULAR MAIL

Steve Brown, President and CEO
RBC Life
2301 Crown Court
Irving, TX 75038-4305

Re: RBC Life's Deceptive and Illegal Health Claims

Dear Mr. Brown:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising.

As you may be aware, TINA.org recently investigated 62 MLM companies listed as Direct Selling Association members selling nutritional supplements. Our findings revealed that 60 companies (or 97%) have made or are making – either directly or through their distributors – claims that the companies' products can treat, cure, prevent, alleviate the symptoms of, or reduce the risk of developing diseases or disorders, in violation of the law. See *Is the DSA Ignoring Illegal Health Claims*, available at <https://www.truthinadvertising.org/dsa-ignoring-illegal-health-claims/>.

We found that RBC Life is one of the 60 companies at issue. A database containing a small sampling of inappropriate health claims being made can be found here: <https://www.truthinadvertising.org/rbc-life-health-claims-database/>.

I trust that your company will take immediate action to remove all unsubstantiated and illegal health claims being made, as well as ensure that no future misrepresentations are made.

If you have any questions or need further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc: Joseph Mariano, President, Direct Selling Association
Jared O. Blum, Esq., DSA Code of Ethics Administrator



November 22, 2016

VIA REGULAR MAIL

Robert L. Montgomery, CEO
Reliv International, Inc.
PO Box 405
Chesterfield, MO 63006

Re: Reliv International's Deceptive and Illegal Health Claims

Dear Mr. Montgomery:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising.

As you may be aware, TINA.org recently investigated 62 MLM companies listed as Direct Selling Association members selling nutritional supplements. Our findings revealed that 60 companies (or 97%) have made or are making – either directly or through their distributors – claims that the companies' products can treat, cure, prevent, alleviate the symptoms of, or reduce the risk of developing diseases or disorders, in violation of the law. See *Is the DSA Ignoring Illegal Health Claims*, available at <https://www.truthinadvertising.org/dsa-ignoring-illegal-health-claims/>.

We found that Reliv International is one of the 60 companies at issue. A database containing a small sampling of inappropriate health claims being made can be found here: <https://www.truthinadvertising.org/reliv-health-claims-database/>.

I trust that your company will take immediate action to remove all unsubstantiated and illegal health claims being made, as well as ensure that no future misrepresentations are made.

If you have any questions or need further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc: Joseph Mariano, President, Direct Selling Association
Jared O. Blum, Esq., DSA Code of Ethics Administrator



November 22, 2016

VIA REGULAR MAIL

Chief Executive Officer/President
Sanki Global LLC
6720 Via Austi Parkway, Suite 450
Las Vegas, NV 89119-3570

Re: Sanki Global's Deceptive and Illegal Health Claims

Dear Sir or Madam:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising.

As you may be aware, TINA.org recently investigated 62 MLM companies listed as Direct Selling Association members selling nutritional supplements. Our findings revealed that 60 companies (or 97%) have made or are making – either directly or through their distributors – claims that the companies' products can treat, cure, prevent, alleviate the symptoms of, or reduce the risk of developing diseases or disorders, in violation of the law. See *Is the DSA Ignoring Illegal Health Claims*, available at <https://www.truthinadvertising.org/dsa-ignoring-illegal-health-claims/>.

We found that Sanki Global is one of the 60 companies at issue. A database containing a small sampling of inappropriate health claims being made can be found here: <https://www.truthinadvertising.org/sanki-health-claims-database/>.

I trust that your company will take immediate action to remove all unsubstantiated and illegal health claims being made, as well as ensure that no future misrepresentations are made.

If you have any questions or need further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc: Joseph Mariano, President, Direct Selling Association
Jared O. Blum, Esq., DSA Code of Ethics Administrator



November 22, 2016

VIA REGULAR MAIL

Roger Barnett, Chief Executive Officer
Shaklee Corporation
4747 Willow Road
Pleasanton, CA 94588

Re: Shaklee Corporation's Deceptive and Illegal Health Claims

Dear Mr. Barnett:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising.

As you may be aware, TINA.org recently investigated 62 MLM companies listed as Direct Selling Association members selling nutritional supplements. Our findings revealed that 60 companies (or 97%) have made or are making – either directly or through their distributors – claims that the companies' products can treat, cure, prevent, alleviate the symptoms of, or reduce the risk of developing diseases or disorders, in violation of the law. *See Is the DSA Ignoring Illegal Health Claims*, available at <https://www.truthinadvertising.org/dsa-ignoring-illegal-health-claims/>.

We found that Shaklee Corporation is one of the 60 companies at issue. A database containing a small sampling of inappropriate health claims being made can be found here: <https://www.truthinadvertising.org/shaklee-health-claims-database/>.

I trust that your company will take immediate action to remove all unsubstantiated and illegal health claims being made, as well as ensure that no future misrepresentations are made.

If you have any questions or need further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc: Joseph Mariano, President, Direct Selling Association
Jared O. Blum, Esq., DSA Code of Ethics Administrator



November 22, 2016

VIA REGULAR MAIL

Mark Adams, Chief Executive Officer
Sozo Global, Inc.
6101 W. Courtyard Drive
Bldg 5, Suite 100
Austin, Texas 78730

Re: Sozo Global's Deceptive and Illegal Health Claims

Dear Mr. Adams:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising.

As you may be aware, TINA.org recently investigated 62 MLM companies listed as Direct Selling Association members selling nutritional supplements. Our findings revealed that 60 companies (or 97%) have made or are making – either directly or through their distributors – claims that the companies' products can treat, cure, prevent, alleviate the symptoms of, or reduce the risk of developing diseases or disorders, in violation of the law. See *Is the DSA Ignoring Illegal Health Claims*, available at <https://www.truthinadvertising.org/dsa-ignoring-illegal-health-claims/>.

We found that Sozo Global is one of the 60 companies at issue. A database containing a small sampling of inappropriate health claims being made can be found here: <https://www.truthinadvertising.org/sozo-global-health-claims-database/>.

I trust that your company will take immediate action to remove all unsubstantiated and illegal health claims being made, as well as ensure that no future misrepresentations are made.

If you have any questions or need further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc: Joseph Mariano, President, Direct Selling Association
Jared O. Blum, Esq., DSA Code of Ethics Administrator



November 22, 2016

VIA REGULAR MAIL

Ray C. Carter Jr., Chief Executive Officer
Stemtech International
2010 NW 150th Avenue
Pembroke Pines, FL 33028

Re: Stemtech International's Deceptive and Illegal Health Claims

Dear Mr. Carter:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising.

As you may be aware, TINA.org recently investigated 62 MLM companies listed as Direct Selling Association members selling nutritional supplements. Our findings revealed that 60 companies (or 97%) have made or are making – either directly or through their distributors – claims that the companies' products can treat, cure, prevent, alleviate the symptoms of, or reduce the risk of developing diseases or disorders, in violation of the law. *See* *Is the DSA Ignoring Illegal Health Claims*, available at <https://www.truthinadvertising.org/dsa-ignoring-illegal-health-claims/>.

We found that Stemtech International is one of the 60 companies at issue. A database containing a small sampling of inappropriate health claims being made can be found here: <https://www.truthinadvertising.org/stemtech-health-claims-database/>.

I trust that your company will take immediate action to remove all unsubstantiated and illegal health claims being made, as well as ensure that no future misrepresentations are made.

If you have any questions or need further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc: Joseph Mariano, President, Direct Selling Association
Jared O. Blum, Esq., DSA Code of Ethics Administrator



November 22, 2016

VIA REGULAR MAIL

Oi-Lin Chen, President
Sunrider International
1625 Abalone Ave.
Torrance, CA 90501

Re: Sunrider International's Deceptive and Illegal Health Claims

Dear Ms. Chen:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising.

As you may be aware, TINA.org recently investigated 62 MLM companies listed as Direct Selling Association members selling nutritional supplements. Our findings revealed that 60 companies (or 97%) have made or are making – either directly or through their distributors – claims that the companies' products can treat, cure, prevent, alleviate the symptoms of, or reduce the risk of developing diseases or disorders, in violation of the law. *See* *Is the DSA Ignoring Illegal Health Claims*, available at <https://www.truthinadvertising.org/dsa-ignoring-illegal-health-claims/>.

We found that Sunrider International is one of the 60 companies at issue. A database containing a small sampling of inappropriate health claims being made can be found here: <https://www.truthinadvertising.org/sunrider-health-claims-database/>.

I trust that your company will take immediate action to remove all unsubstantiated and illegal health claims being made, as well as ensure that no future misrepresentations are made.

If you have any questions or need further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc: Joseph Mariano, President, Direct Selling Association
Jared O. Blum, Esq., DSA Code of Ethics Administrator



November 22, 2016

VIA REGULAR MAIL

Brandon Langer, President
Symmetry Global
110 Cypress Station Dr. Suite 295
Houston, TX 77090

Re: Symmetry Global's Deceptive and Illegal Health Claims

Dear Mr. Langer:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising.

As you may be aware, TINA.org recently investigated 62 MLM companies listed as Direct Selling Association members selling nutritional supplements. Our findings revealed that 60 companies (or 97%) have made or are making – either directly or through their distributors – claims that the companies' products can treat, cure, prevent, alleviate the symptoms of, or reduce the risk of developing diseases or disorders, in violation of the law. *See* *Is the DSA Ignoring Illegal Health Claims*, available at <https://www.truthinadvertising.org/dsa-ignoring-illegal-health-claims/>.

We found that Symmetry Global is one of the 60 companies at issue. A database containing a small sampling of inappropriate health claims being made can be found here: <https://www.truthinadvertising.org/symmetry-health-claims-database/>.

I trust that your company will take immediate action to remove all unsubstantiated and illegal health claims being made, as well as ensure that no future misrepresentations are made.

If you have any questions or need further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc: Joseph Mariano, President, Direct Selling Association
Jared O. Blum, Esq., DSA Code of Ethics Administrator



November 22, 2016

VIA REGULAR MAIL

Chief Executive Officer/President
Synergy Worldwide
1955 W Grove Pkwy #100
Pleasant Grove, UT 84062

Re: Synergy Worldwide's Deceptive and Illegal Health Claims

Dear Sir or Madam:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising.

As you may be aware, TINA.org recently investigated 62 MLM companies listed as Direct Selling Association members selling nutritional supplements. Our findings revealed that 60 companies (or 97%) have made or are making – either directly or through their distributors – claims that the companies' products can treat, cure, prevent, alleviate the symptoms of, or reduce the risk of developing diseases or disorders, in violation of the law. *See* *Is the DSA Ignoring Illegal Health Claims*, available at <https://www.truthinadvertising.org/dsa-ignoring-illegal-health-claims/>.

We found that Synergy Worldwide is one of the 60 companies at issue. A database containing a small sampling of inappropriate health claims being made can be found here: <https://www.truthinadvertising.org/synergy-health-claims-database/>.

I trust that your company will take immediate action to remove all unsubstantiated and illegal health claims being made, as well as ensure that no future misrepresentations are made.

If you have any questions or need further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc: Joseph Mariano, President, Direct Selling Association
Jared O. Blum, Esq., DSA Code of Ethics Administrator



November 22, 2016

VIA REGULAR MAIL

Carl Daikeler, Chief Executive Officer
Team Beachbody
Beachbody Corporate
3301 Exposition Blvd
3rd Floor
Santa Monica, CA 90404

Re: Team Beachbody's Deceptive and Illegal Health Claims

Dear Mr. Daikeler:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising.

As you may be aware, TINA.org recently investigated 62 MLM companies listed as Direct Selling Association members selling nutritional supplements. Our findings revealed that 60 companies (or 97%) have made or are making – either directly or through their distributors – claims that the companies' products can treat, cure, prevent, alleviate the symptoms of, or reduce the risk of developing diseases or disorders, in violation of the law. *See* [Is the DSA Ignoring Illegal Health Claims](https://www.truthinadvertising.org/dsa-ignoring-illegal-health-claims/), available at <https://www.truthinadvertising.org/dsa-ignoring-illegal-health-claims/>.

We found that Team Beachbody is one of the 60 companies at issue. A database containing a small sampling of inappropriate health claims being made can be found here: <https://www.truthinadvertising.org/team-beachbody-health-claims-database/>.

I trust that your company will take immediate action to remove all unsubstantiated and illegal health claims being made, as well as ensure that no future misrepresentations are made.

If you have any questions or need further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc: Joseph Mariano, President, Direct Selling Association
Jared O. Blum, Esq., DSA Code of Ethics Administrator



November 22, 2016

VIA REGULAR MAIL

Mark A. Stevens, Chief Executive Officer
Trévo, LLC
1601 NW Expressway Tower Suite 1800
Oklahoma City, OK 73118

Re: Trévo's Deceptive and Illegal Health Claims

Dear Mr. Stevens:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising.

As you may be aware, TINA.org recently investigated 62 MLM companies listed as Direct Selling Association members selling nutritional supplements. Our findings revealed that 60 companies (or 97%) have made or are making – either directly or through their distributors – claims that the companies' products can treat, cure, prevent, alleviate the symptoms of, or reduce the risk of developing diseases or disorders, in violation of the law. *See* *Is the DSA Ignoring Illegal Health Claims*, available at <https://www.truthinadvertising.org/dsa-ignoring-illegal-health-claims/>.

We found that Trévo is one of the 60 companies at issue. A database containing a small sampling of inappropriate health claims being made can be found here: <https://www.truthinadvertising.org/trevo-health-claims-database/>.

I trust that your company will take immediate action to remove all unsubstantiated and illegal health claims being made, as well as ensure that no future misrepresentations are made.

If you have any questions or need further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc: Joseph Mariano, President, Direct Selling Association
Jared O. Blum, Esq., DSA Code of Ethics Administrator



November 22, 2016

VIA REGULAR MAIL

Stewart Hughes, Chief Executive Officer
Unicity
1201 N. 800 East
Orem, Utah 84097

Re: Unicity's Deceptive and Illegal Health Claims

Dear Mr. Hughes:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising.

As you may be aware, TINA.org recently investigated 62 MLM companies listed as Direct Selling Association members selling nutritional supplements. Our findings revealed that 60 companies (or 97%) have made or are making – either directly or through their distributors – claims that the companies' products can treat, cure, prevent, alleviate the symptoms of, or reduce the risk of developing diseases or disorders, in violation of the law. *See Is the DSA Ignoring Illegal Health Claims*, available at <https://www.truthinadvertising.org/dsa-ignoring-illegal-health-claims/>.

We found that Unicity is one of the 60 companies at issue. A database containing a small sampling of inappropriate health claims being made can be found here: <https://www.truthinadvertising.org/unicity-health-claims-database/>.

I trust that your company will take immediate action to remove all unsubstantiated and illegal health claims being made, as well as ensure that no future misrepresentations are made.

If you have any questions or need further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc: Joseph Mariano, President, Direct Selling Association
Jared O. Blum, Esq., DSA Code of Ethics Administrator



November 22, 2016

VIA REGULAR MAIL

HY Sung, Chief Executive Officer
Univera, Inc.
3005 1st Ave
Seattle, WA 98121

Re: Univera's Deceptive and Illegal Health Claims

Dear Mr. Sung:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising.

As you may be aware, TINA.org recently investigated 62 MLM companies listed as Direct Selling Association members selling nutritional supplements. Our findings revealed that 60 companies (or 97%) have made or are making – either directly or through their distributors – claims that the companies' products can treat, cure, prevent, alleviate the symptoms of, or reduce the risk of developing diseases or disorders, in violation of the law. *See Is the DSA Ignoring Illegal Health Claims*, available at <https://www.truthinadvertising.org/dsa-ignoring-illegal-health-claims/>.

We found that Univera is one of the 60 companies at issue. A database containing a small sampling of inappropriate health claims being made can be found here: <https://www.truthinadvertising.org/univera-health-claims-database/>.

I trust that your company will take immediate action to remove all unsubstantiated and illegal health claims being made, as well as ensure that no future misrepresentations are made.

If you have any questions or need further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc: Joseph Mariano, President, Direct Selling Association
Jared O. Blum, Esq., DSA Code of Ethics Administrator



November 22, 2016

VIA REGULAR MAIL

David Wentz, Kevin Guest, Chief Executive Officers
USANA Health Sciences, Inc.
3838 West Parkway Boulevard
Salt Lake City, UT 84120

Re: USANA Health Sciences' Deceptive and Illegal Health Claims

Dear Mr. Wentz and Mr. Guest:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising.

As you may be aware, TINA.org recently investigated 62 MLM companies listed as Direct Selling Association members selling nutritional supplements. Our findings revealed that 60 companies (or 97%) have made or are making – either directly or through their distributors – claims that the companies' products can treat, cure, prevent, alleviate the symptoms of, or reduce the risk of developing diseases or disorders, in violation of the law. *See* *Is the DSA Ignoring Illegal Health Claims*, available at <https://www.truthinadvertising.org/dsa-ignoring-illegal-health-claims/>.

We found that USANA Health Sciences is one of the 60 companies at issue. A database containing a small sampling of inappropriate health claims being made can be found here: <https://www.truthinadvertising.org/usana-health-claims-database/>.

I trust that your company will take immediate action to remove all unsubstantiated and illegal health claims being made, as well as ensure that no future misrepresentations are made.

If you have any questions or need further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc: Joseph Mariano, President, Direct Selling Association
Jared O. Blum, Esq., DSA Code of Ethics Administrator



November 22, 2016

VIA REGULAR MAIL

Joseph P. Urso, Chief Executive Officer
Vollara, LLC
5420 Lyndon B Johnson Fwy
Dallas, TX 75240

Re: Vollara's Deceptive and Illegal Health Claims

Dear Mr. Urso:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising.

As you may be aware, TINA.org recently investigated 62 MLM companies listed as Direct Selling Association members selling nutritional supplements. Our findings revealed that 60 companies (or 97%) have made or are making – either directly or through their distributors – claims that the companies' products can treat, cure, prevent, alleviate the symptoms of, or reduce the risk of developing diseases or disorders, in violation of the law. *See Is the DSA Ignoring Illegal Health Claims*, available at <https://www.truthinadvertising.org/dsa-ignoring-illegal-health-claims/>.

We found that Vollara is one of the 60 companies at issue. A database containing a small sampling of inappropriate health claims being made can be found here: <https://www.truthinadvertising.org/vollara-health-claims-database/>.

I trust that your company will take immediate action to remove all unsubstantiated and illegal health claims being made, as well as ensure that no future misrepresentations are made.

If you have any questions or need further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc: Joseph Mariano, President, Direct Selling Association
Jared O. Blum, Esq., DSA Code of Ethics Administrator



November 22, 2016

VIA REGULAR MAIL

Aaron Garrity, Chief Executive Officer
Xango, LLC
2889 Ashton Blvd.
Lehi, UT 84043

Re: Xango's Deceptive and Illegal Health Claims

Dear Mr. Garrity:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising.

As you may be aware, TINA.org recently investigated 62 MLM companies listed as Direct Selling Association members selling nutritional supplements. Our findings revealed that 60 companies (or 97%) have made or are making – either directly or through their distributors – claims that the companies' products can treat, cure, prevent, alleviate the symptoms of, or reduce the risk of developing diseases or disorders, in violation of the law. *See Is the DSA Ignoring Illegal Health Claims*, available at <https://www.truthinadvertising.org/dsa-ignoring-illegal-health-claims/>.

We found that Xango is one of the 60 companies at issue. A database containing a small sampling of inappropriate health claims being made can be found here: <https://www.truthinadvertising.org/xango-health-claims-database/>.

I trust that your company will take immediate action to remove all unsubstantiated and illegal health claims being made, as well as ensure that no future misrepresentations are made.

If you have any questions or need further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc: Joseph Mariano, President, Direct Selling Association
Jared O. Blum, Esq., DSA Code of Ethics Administrator



November 22, 2016

VIA REGULAR MAIL

Dennis Wong, Chief Executive Officer
YOR Health
2802 Kelvin Ave
Suite 150
Irvine, CA 92614

Re: YOR Health's Deceptive and Illegal Health Claims

Dear Mr. Wong:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising.

As you may be aware, TINA.org recently investigated 62 MLM companies listed as Direct Selling Association members selling nutritional supplements. Our findings revealed that 60 companies (or 97%) have made or are making – either directly or through their distributors – claims that the companies' products can treat, cure, prevent, alleviate the symptoms of, or reduce the risk of developing diseases or disorders, in violation of the law. *See* Is the DSA Ignoring Illegal Health Claims, available at <https://www.truthinadvertising.org/dsa-ignoring-illegal-health-claims/>.

We found that YOR Health is one of the 60 companies at issue. A database containing a small sampling of inappropriate health claims being made can be found here: <https://www.truthinadvertising.org/yorhealth-health-claims-database/>.

I trust that your company will take immediate action to remove all unsubstantiated and illegal health claims being made, as well as ensure that no future misrepresentations are made.

If you have any questions or need further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc: Joseph Mariano, President, Direct Selling Association
Jared O. Blum, Esq., DSA Code of Ethics Administrator



November 22, 2016

VIA REGULAR MAIL

Mary Young, Chief Executive Officer
Young Living
Thanksgiving Point Business Park
3125 Executive Parkway
Lehi, UT 84043

Re: Young Living's Deceptive and Illegal Health Claims

Dear Ms. Young:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising.

As you may be aware, TINA.org recently investigated 62 MLM companies listed as Direct Selling Association members selling nutritional supplements. Our findings revealed that 60 companies (or 97%) have made or are making – either directly or through their distributors – claims that the companies' products can treat, cure, prevent, alleviate the symptoms of, or reduce the risk of developing diseases or disorders, in violation of the law. *See* Is the DSA Ignoring Illegal Health Claims, available at <https://www.truthinadvertising.org/dsa-ignoring-illegal-health-claims/>.

We found that Young Living is one of the 60 companies at issue. A database containing a small sampling of inappropriate health claims being made can be found here: <https://www.truthinadvertising.org/young-living-health-claims-database/>.

I trust that your company will take immediate action to remove all unsubstantiated and illegal health claims being made, as well as ensure that no future misrepresentations are made.

If you have any questions or need further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc: Joseph Mariano, President, Direct Selling Association
Jared O. Blum, Esq., DSA Code of Ethics Administrator



November 22, 2016

VIA REGULAR MAIL

Michael Perry, Chief Operating Officer USA
Zinzino, LLC
1200 University Blvd. Ste 220
Jupiter, FL 33458

Re: Zinzino's Deceptive and Illegal Health Claims

Dear Mr. Perry:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising.

As you may be aware, TINA.org recently investigated 62 MLM companies listed as Direct Selling Association members selling nutritional supplements. Our findings revealed that 60 companies (or 97%) have made or are making – either directly or through their distributors – claims that the companies' products can treat, cure, prevent, alleviate the symptoms of, or reduce the risk of developing diseases or disorders, in violation of the law. *See* *Is the DSA Ignoring Illegal Health Claims*, available at <https://www.truthinadvertising.org/dsa-ignoring-illegal-health-claims/>.

We found that Zinzino is one of the 60 companies at issue. A database containing a small sampling of inappropriate health claims being made can be found here: <https://www.truthinadvertising.org/zinzino-health-claims-database/>.

I trust that your company will take immediate action to remove all unsubstantiated and illegal health claims being made, as well as ensure that no future misrepresentations are made.

If you have any questions or need further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc: Joseph Mariano, President, Direct Selling Association
Jared O. Blum, Esq., DSA Code of Ethics Administrator



November 22, 2016

VIA REGULAR MAIL

Bill Farley, Chief Executive Officer
Zrii
14183 So. Minuteman Drive
Draper, UT 84020

Re: Zrii's Deceptive and Illegal Health Claims

Dear Mr. Farley:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising.

As you may be aware, TINA.org recently investigated 62 MLM companies listed as Direct Selling Association members selling nutritional supplements. Our findings revealed that 60 companies (or 97%) have made or are making – either directly or through their distributors – claims that the companies' products can treat, cure, prevent, alleviate the symptoms of, or reduce the risk of developing diseases or disorders, in violation of the law. *See* *Is the DSA Ignoring Illegal Health Claims*, available at <https://www.truthinadvertising.org/dsa-ignoring-illegal-health-claims/>.

We found that Zrii is one of the 60 companies at issue. A database containing a small sampling of inappropriate health claims being made can be found here: <https://www.truthinadvertising.org/zrii-health-claims-database/>.

I trust that your company will take immediate action to remove all unsubstantiated and illegal health claims being made, as well as ensure that no future misrepresentations are made.

If you have any questions or need further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc: Joseph Mariano, President, Direct Selling Association
Jared O. Blum, Esq., DSA Code of Ethics Administrator



November 22, 2016

VIA REGULAR MAIL

Mark Jarvis, Jay Shafer, Chief Executive Officers
Zurvita
800 Town & Country Blvd.
Suite 500
Houston, TX 77024

Re: Zurvita's Deceptive and Illegal Health Claims

Dear Mr. Jarvis and Mr. Shafer:

I am writing to you on behalf of Truth in Advertising, Inc. ("TINA.org"), a nonprofit consumer advocacy organization dedicated to protecting consumers from deceptive advertising.

As you may be aware, TINA.org recently investigated 62 MLM companies listed as Direct Selling Association members selling nutritional supplements. Our findings revealed that 60 companies (or 97%) have made or are making – either directly or through their distributors – claims that the companies' products can treat, cure, prevent, alleviate the symptoms of, or reduce the risk of developing diseases or disorders, in violation of the law. See *Is the DSA Ignoring Illegal Health Claims*, available at <https://www.truthinadvertising.org/dsa-ignoring-illegal-health-claims/>.

We found that Zurvita is one of the 60 companies at issue. A database containing a small sampling of inappropriate health claims being made can be found here: <https://www.truthinadvertising.org/zurvita-health-claims-database/>.

I trust that your company will take immediate action to remove all unsubstantiated and illegal health claims being made, as well as ensure that no future misrepresentations are made.

If you have any questions or need further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "L. Smith".

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Cc: Joseph Mariano, President, Direct Selling Association
Jared O. Blum, Esq., DSA Code of Ethics Administrator