

# UNICITY

December 22, 2016

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

Re: Your letter regarding online claims about Unicity products

Dear Ms. Smith:

Unicity appreciates the work you and your colleagues at Truth in Advertising do to protect consumers. We want you to know that we strive to comply with all the regulations that govern our business of providing our customers with products that can help them stay healthy, including the prohibition against illegal health claims.

To this end, immediately upon receipt of your letter we began investigating the specific examples your team found, and have been able to identify the locations of all but one, that being what appears to be a social media post labeled on your list of claims as "Alzheimer's 1" and located here:

[https://www.truthinadvertising.org/wp-content/uploads/2016/09/Alzheimers2\\_Unicity.pdf](https://www.truthinadvertising.org/wp-content/uploads/2016/09/Alzheimers2_Unicity.pdf) . We have been reaching out to the other sites and have had some success getting them removed. We will continue to vigorously pursue the remainder. We would also ask that you send us the source link or any other identifying information related to the "Alzheimer's 1" post so that we can also reach out to them.

But Unicity recognizes that this is an issue that extends beyond the specific examples you referenced, and since receiving your letter we have had numerous conversations among our staff about how we can improve our monitoring and enforcement of distributor posts about our products. This has included a meeting with the provider of the FieldWatch service, which we are evaluating as a potential tool to help us find illegal claims online. This enhanced focus will also assist us in tailoring future distributor trainings to better address this problem.

With a global distributor base that numbers in the hundreds of thousands, this is obviously a large undertaking and one that will require prolonged persistence of effort, but we are committed to it and will do what we can to address this problem that, as your research indicates, is so widespread across not just direct selling companies, but the dietary supplement industry writ large.

Sincerely,



Rocky Smart  
Vice President – Legal  
Unicity International, Inc.



January 6, 2017

**VIA REGULAR MAIL**

Rocky Smart  
Vice President – Legal  
Unicity International, Inc.  
1201 N. 800 East  
Orem, Utah 84097

Re: Your letter to TINA.org regarding Unicity

Dear Mr. Smart:

I recently received your December 22nd letter you sent in response to the letter I sent to Stewart Hughes on November 22nd. I apologize for the delay in getting back to you – I have been out of the office and just returned yesterday.

In your letter, you asked for the source link or any other identifying information related to the "Alzheimer's 1" post in our Unicity Health Claims Database. The URL for that post is <https://www.facebook.com/unicitybetterlife/photos/a.440945266016517.1073741827.440762266034817/440946352683075/?type=3&theater>.

We will be posting all company responses to our notification letters on our website. If you wish to write further, we'd be happy to post any updates you have as well.

Thank you for reaching out. We are glad to see Unicity is making efforts in the right direction.

Sincerely,

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

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

# UNICITY

January 17, 2017

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

Re: TINA.org's investigation of Unicity

Dear Ms. Smith:

Thank you for your letter with information regarding the source of the "Alzheimer's 1" posting. This is helpful as Unicity's legal team continues to treat this matter with the utmost urgency, meeting at least weekly to discuss progress and strategy to most effectively remove these posts as well as address the broader challenge of educating and monitoring what our distributor force is saying about our products elsewhere.

Last week a colleague of mine had the pleasure of attending a presentation by TINA.org's Executive Director Bonnie Patten in Dallas, which was very informative. He said that Ms. Patten mentioned that you will be following up on all the examples listed in your databases later in the year. He also mentioned that in response to a question from another attendee, Ms. Patten said TINA.org is willing to pass along the sources of all claims on their databases, to ensure that the ones companies are having removed are in fact the ones your team will be following up on, and not just a sharing or copying of the ones you have identified. We would very much appreciate this source information for all the examples on the "Unicity Health Claims Database" webpage.

Thank you in advance for your assistance helping us ensure that these are removed as we pursue our larger goal of ultimately cleaning up and deterring all inappropriate online content about our products.

Sincerely,



Rocky Smart  
Vice President – Legal  
Unicity International, Inc.