



January 15, 2018

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

Subject: Your letter dated December 18, 2017

Dear Ms. Smith,

Thank you for your letter of December 18, 2017 regarding Immunotec listings in the Truth in Advertising income claims database.

Please be assured that we share your concern of this matter. As part of our internal compliance business processes, we continuously monitor the Internet, request the removal of non-compliant income claims that we locate, follow-up actively with individuals who are slow in responding or who do not respond at all, and enforce accordingly. Please note that we do not sanction nor tolerate deceptive or inaccurate claims.

We have investigated each of the 15 listings you have identified. We believe that certain of the listings, such as the posting of our information flyer on our incentive trip (Claim 9) and our current Corporate Video (Claim 13), did not contain any inappropriate information. Please note that Claims 2, 3 and 4 do not depict any Immunotec Independent Consultants nor do they pertain to income, but rather are pictures of an Immunotec Officer remitting checks to support and sponsor Rowing Canada Aviron Athletes.

Certain of the listings consisted of old materials which had been removed from our company's website from 3 to 10 years ago. Yet, we have followed up in each case to determine if such materials could be removed from the website or webpage where they still appear, when possible.

Based on the information you have provided us, our compliance team has proceeded to obtain appropriate verifications and when relevant, has contacted the Independent Consultants who have posted such materials to request their removal.

Our measures to address the referenced listings have been taken in a sincere effort to maintain compliance, as we have done and continue to do on a continuous basis. The fact that we have taken such actions should not be taken as an admission of any wrongdoing by Immunotec or any of its Independent Consultants.

I trust this information is useful. We would very much appreciate if you could advise us of any non-compliant claims of which you may become aware in the future.

Sincerely,

Geneviève Foster
Legal Counsel to Immunotec

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