



January 16, 2018

Laura Smith, Esq.  
Legal Director  
Truth in Advertising  
P.O. Box 927  
Madison, CT 06443  
Via Email and U.S. Mail

**Re: Zurvita Compliance 2018**

Dear Ms. Smith

My name is Erin McGinnis. I am the Director of Compliance for Zurvita, Inc. and Zurvita Holdings, Inc. ("Zurvita"). I have written you in the past and I am writing to you, again, today, to provide you with an update on Zurvita's compliance strategies and successes specific to the new information posted by Truth in Advertising ("TINA") regarding its audit of publicly available income claims specific to Zurvita. We have independently investigated each of the links appearing in Tina's database specific to Zurvita and wanted to provide you with a summary of our continuous efforts, below, and hope that you will publish this letter to demonstrate Zurvita's genuine commitment to Truth in Advertising. You have our express permission to do so.

TINA identified two Market Wired links to press releases from years 2010 and 2011. We investigated and determined that Market Wired is now owned by NASDAQ. We contacted NASDAQ and, at our request, they removed the dated press releases from seven (7) and eight (8) years ago because those press releases do not accurately represent our current marketing messages. Zurvita Instagram 1 and Zurvita IT Business Net 1 were both removed/resolved at our request. Zurvita Twitter 1 and Zurvita website Executive Team page 1, website Homepage, website Opportunity page 1 and 2 identified statements were removed and/or updated. The Zurvita You Tube 1 video could not be readily removed, so we filed an infringement report with YouTube to have it removed. Zurvita Facebook 1, 3, and 8, were resolved/ removed. Inactive consultants, whose pages appear at Zurvita Facebook 2, 4, 5, 10, and 11 have all been contacted by email directing them to remove the language at issue. A spreadsheet reflecting our immediate attention to each of these claims is attached for your reference.

**Ongoing Commitment to Truth:** Not only is Zurvita constantly monitoring the internet for inappropriate health and income claims through its compliance team's daily efforts and Field Watch's patented software, but Zurvita is also monitoring any other inappropriate or exaggerated claims about any aspect of the Zurvita experience. Zurvita takes compliance very seriously and is committed to Truth in Advertising.

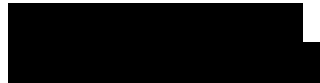


Zurvita's founding principles are (1) to build a company that honors and glorifies God;(2) develop a company with humble leadership; (3) create an environment where people can win at every level. We at Zurvita strive to reflect these principles every day and are working hard to make sure all messaging about Zurvita on the internet is both truthful and reflective our founding principles.

Please call me to discuss any other ideas you and your team may have to assist us in our tireless efforts to reflect the truth.

With warmest regards,

Erin McGinnis  
Director of Compliance



**TINA.ORG**

**Zurvita Income Claim  
Audit**

<b>Claim</b>	<b>Status</b>
Zurvita Instagram 1 make your dreams come true	<b>Resolved</b>
Zurvita ITBusinessNet 1 financial freedom	<b>Resolved</b>
Zurvita MarketWired 1 financial freedom	<b>Resolved</b>
Zurvita MarketWired 2 Financial Freedom	<b>Resolved</b>
Zurvita Opportunity Page 1 financial freedom	<b>Resolved</b>
<a href="#">Zurvita Twitter 1 earn income</a>	<b>Removed</b>
Zurvita website Executive Team page 1 security financial free	<b>Resolved</b>
Zurvita website Homepage 1 immediate income	<b>Resolved</b>
Zurvita website Opportunity page 1 financial freedom	<b>Resolved</b>

[Zurvita website Opportunity page 2 financial freedom](#)

**Resolved**

[Zurvita YouTube 1 \\$1000 in first 30 days](#)

**An infringement report has been filed with Youtube**

[ZurvitaFacebook1](#)

**Resolved**

**Inactive - the page shows a post stating closed and not adding new members. A message has been left asking the Consultant to close the page through Facebook.**

[ZurvitaFacebook2](#)

[ZurvitaFacebook3](#)

**Resolved**

[ZurvitaFacebook4](#)

**Consultant - Inactive / email sent**

[ZurvitaFacebook5](#)

**Consultant - Inactive / email sent**

[ZurvitaFacebook6](#)

**Emailed link and left vm**

[ZurvitaFacebook8](#)

**Resolve**

[ZurvitaFacebook10](#)

**Consultant - Inactive / email sent**

[ZurvitaFacebook11](#)

**Consultant - Inactive / email sent**