



UNITED STATES OF AMERICA
Federal Trade Commission
WASHINGTON, D.C. 20580

June 5, 2020
Via Electronic Mail

Isagenix International LLC
c/o Justin Powell, General Counsel
155 E. Rivulon Boulevard
Gilbert, Arizona 85297

Warning Regarding Health and Earnings Claims Related to Coronavirus Disease 2019 (COVID-19)

Dear Mr. Powell

FTC staff has reviewed social media posts made by Isagenix International LLC (“Isagenix”) business opportunity participants or representatives that unlawfully advertise that certain products treat or prevent Coronavirus Disease 2019 (COVID-19) and misrepresent that consumers who become Isagenix business opportunity participants are likely to earn substantial income. This letter is to provide you with information about laws and regulations enforced by the Federal Trade Commission (“FTC”) that may bear upon your business activities, including the activities of your business opportunity participants and representatives.

An example of Coronavirus prevention or treatment claims made by business opportunity participants or representatives include:

- x “In the fight against COVID-19 – Keep moving every day and eating healthy! Isagenix shakes boost your immunity 500%!”

Some examples of earnings claims made by business opportunity participants or representatives include:

- x “The last 1 1/2 months of this covid-19 pandemic has made me even more GRATEFUL.... We have been able to put [our daughter] through 4 years of college @ MSU and give her a head start in her next chapter of life with no college debt.... It breaks my heart to see families struggling nutritionally and financially, especially when we have such an amazing and LIFE CHANGING SOLUTION to help them on all fronts. RESIDUAL INCOME IS A GAME CHANGER, and if you are just OPEN to listening, it can change your family’s life too.”
- x “Will yo u get a stimulus check? . . . [W]ould a extra \$4,100 change your family lifestyle? Well my firm is offering that ah more so who is this firm . . . Text Isagenix to [5 digit SMS text number].”

It is unlawful under the FTC Act, 15 U.S.C. § 41 et seq. to advertise that a product can prevent, treat, or cure human disease unless you possess competent and reliable scientific evidence, including, when appropriate, well-controlled human clinical studies substantiating that