

BBB NATIONAL PROGRAMS, INC.
The Direct Selling Self-Regulatory Council
Case Number 36-2021: – Government Referral – Bulavita

COMPANY DESCRIPTION

Bulavita (the “Company”) is a direct selling company that was founded in 2020 and which offers muscadine-based health and nutritional supplement products.

BASIS OF INQUIRY

The Direct Selling Self-Regulatory Council (“DSSRC”) is a national advertising self-regulation program administered by BBB National Programs. This inquiry was commenced by DSSRC pursuant to its ongoing independent monitoring of advertising and marketing claims in the direct selling industry.

DSSRC identified the following representative product performance claims and earnings claims being disseminated on the Company website and by Company salesforce members on social media. DSSRC was concerned that the representative claims below communicate that Bulavita products can protect against serious health-related conditions including COVID-19 and that Bulavita salesforce members can typically earn significant income through the Bulavita business opportunity.

1. Product Claims

- “Get paid while boosting your immune system, let’s fight this thing together...”
 - Image with copy stating “Get the Power Immune Pack! Amp up your Core Health with Organic Pink Fijian Ginger, Organic Fijian Turmeric, and Tea Tree essential oil!”

Get the Power Immune Pack!

Amp up your Core Health with Organic Pink Fijian Ginger, Organic Fijian Turmeric, and Tea Tree essential oil!

- Enjoy **wholesale pricing** on all products
- Order on a monthly autoship and **save even more!**
- **Get paid** every time you share Bulavita!

PLUS: Start a FREE Bulavita Business with purchase!



Offered **thru March 31st** or while supplies last!
See details at www.bulavita.com

- “How are you boosting your immune system?”

- Image depicting COVID-19 virus with copy stating “3 Strategies to Bolster your Immune System”



- “Are you worried about the Corona Virus with your health or finances? You can boost your immune system and health while boosting your wealth!”

Do you keep your options open? Are you worried about the Corona Virus with your health or finances?

You can boost your immune system and health while boosting your wealth! Watch this short video! Go to:

<http://www.homesuccesspro.com/presentation?Alpha1>.

One Decision can change your Life and Health! Message me for info!

Here we GROW again!

Share the benefits of the
**M20 Business
Boost Pack** and
earn, earn, earn!



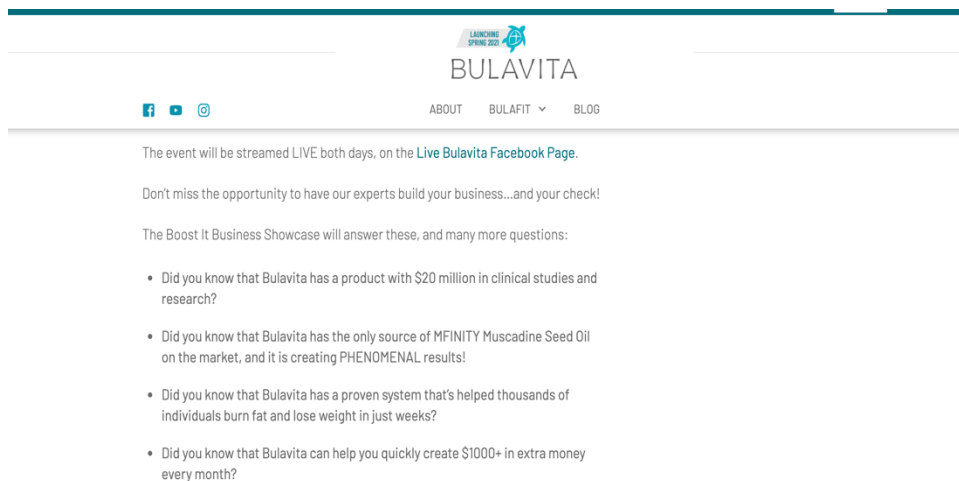
Introduce the M20 Business Boost Pack to 5 NEW Ambassadors & earn*	\$100 WEEKLY BONUSES
And with each 5 new Ambassadors in June you get*	\$100 MONTHLY BONUS
	\$200 TOTAL BONUSES!
	Earn \$100 WITH THE ENROLLER MATCHING BONUS!
*See full details at bulablog.com	

Available for the month of June or while supplies last! See bulablog.com for details.

BULAVITA

- “The antioxidant, antibacterial and antibiofilm properties of muscadine polyphenols provide strong resistance against selected foodborne pathogens such as staphylococcus and E-coli”
- “Other studies indicate that muscadine phytochemicals may prevent obesity-associated metabolic complications by suppressing oxidative and inflammatory stress responses.”

- “Now more than ever, we desperately need the antioxidant and anti-inflammatory properties found in Muscadine-Boost pack. Made by Nature. Proven by Science.”
- “Since 1990 there has been a 40% to 4,200% increase in deaths and disease. Ranging from heart disease to food allergens from Alzheimer’s to Autism.”
- “Whether its weight loss or mental clarity, there’s nothing like feeling that sense of purpose.”
- “Did you know that Bulavita has a product with \$20 million in clinical studies and research?”
- Did you know that Bulavita has a proven system that’s helped thousands of individuals burn fat and lose weight in just weeks?”



2. **Earnings Claims**

- “Income opportunity of a lifetime.”
- “A better way to generate income. A better way to free up their time so that they can live life to the fullest.”
- “We’re willing to pay you a ridiculous amount of money”
- “Whether you’re looking for a side gig, a new career or the opportunity of a lifetime.”
- “The road ahead is wide open. No caps. No limits.”

- “Building a significant income”
- “We know there’s a better way to earn unlimited income. (picture of lavish lifestyle – woman sailing on boat).”
- “Earn residual income and be your own boss and create that walk-away income for you and family for generations to come.”
- “Did you know that Bulavita can help you quickly create \$1000+ in extra money every month”
 - Did you know that Bulavita can help you quickly create \$1000+ in extra money every month?
- “. . . make a million dollars a month or a hundred thousand dollars a month, whatever you desire”

COMPANY’S NON-PARTICIPATION IN THE DSSRC PROCESS

DSSRC first brought the representative claims and issues identified above to the Company’s attention by emailing and sending by overnight mail a copy of an inquiry letter to Bulavita on March 1, 2021. The Company was provided with 15-business days to respond to the DSSRC inquiry pursuant to section (II)(4) of the DSSRC Policies and Procedures.

After the Company failed to provide a response within 15 business days, DSSRC made repeated efforts to contact the Company. After receiving no response, a 10-Day notice was sent to the Company on March 24, 2021 by both email and overnight mail indicating that, if the Company failed to provide a response to DSSRC regarding the claims and issue within 10 business days, the matter would be referred to the appropriate government agency.

Notwithstanding the additional opportunity to respond to DSSRC’s inquiry, the Company again failed to respond to DSSRC. DSSRC also confirmed that all of the subject claims remain active and accessible to the public.

REFERRAL TO GOVERNMENT

DSSRC determined that the claims that were the subject of this inquiry reasonably communicated that Bulavita products can effectively treat serious health-related conditions including COVID-19. In addition, Company salesforce members have disseminated aggressive income opportunity claims on social media including claims that Bulavita presents the “Income opportunity of a lifetime,” that salesforce members can earn “unlimited income” and a “ridiculous amount of money.” All such claims appear unfounded.

Despite DSSRC exercising its due diligence in attempting to contact the Company several times, the Company did not respond to the self-regulatory inquiry. In accordance with section (II)(9) of the DSSRC Policies and Procedures, in the event the company whose marketing is the subject of a DSSRC inquiry fails to participate in the self-regulatory process, DSSRC may refer the matter to an appropriate government agency for review and possible law enforcement action.

Accordingly, based upon the Company's failure to respond to the self-regulatory inquiry, DSSRC referred this matter to the Federal Trade Commission.

(Case No. 36-2021 PCM, closed on 04/14/21)
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