

**BBB NATIONAL PROGRAMS**

***THE DIRECT SELLING SELF-REGULATORY COUNCIL***

MAX INTERNATIONAL, LLC

Case No. 69-2022

Filed 04/05/2022

**MONITORING INQUIRY**

**I. Company Description**

Max International, LLC (“Max International” or the “Company”) is a multi-level direct selling company that markets a line of health-related and wellness products. The Company was also the subject of a previous DSSRC inquiry in 2021.

**II. 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.

*A. Product Claims*

This inquiry involved two health-related product claims disseminated by salesforce members of the Company on social media. The first social media post was disseminated on Instagram and included the claim that Max International products “Protect your body from COVID, another viruses, bacterias, & free radicals” (sic).



The second post was communicated on Facebook and included the claim that the Company's product is "300% better than any other alternative. Best immune system booster....".

**ADVANCED RIBOCEINE TECHNOLOGY**

**300% BETTER THAN ANY OTHER ALTERNATIVE. BEST IMMUNE BOOSTER, ANTIOXIDANT, DETOXIFIER AND ANTI-AGEING SUPPLEMENT**

**CELLGEVITY**  
ADVANCED RIBOCEINE TECHNOLOGY

**The Ultimate GLUTATHIONE Enhancer**

**Glutathione Associations**

Hypertension , heart diseases and stroke	Hepatitis B / Hepatitis C
Cataract and glaucoma	Gastritis (Stomach Ulcers)
Alzheimer's and memory loss	Asthma
Male & female infertility	Chronic fatigue
Erectile Dysfunction	Wound healing
Diabetes mellitus	Skin conditions
Kidney disease	Sickle cell disease
Osteoarthritis	
High cholesterol	
Cancer	

**BOOST your Immune System**

### **III. Company's Position**

#### **A. Product Claims**

Max International promptly responded to DSSRC's inquiry and explained that any claims pertaining to COVID are strictly prohibited by Company Policy and Procedures. The Company also informed DSSRC that its salesforce members receive ongoing, in-person training and are provided with external written material regarding prohibited terms which includes any language pertaining to COVID-19.

Accordingly, Max International immediately addressed DSSRC concerns and had the Instagram post removed.

The Facebook post was disseminated by a salesforce member located in the Philippines. The Company informed DSSRC that it was able to work with its affiliate in the Philippines to have the post removed from circulation. DSSRC independently confirmed that the Facebook post was removed from social media.

### **IV. Administrative Closure**

Health-related claims and establishment claims (i.e., "300% better than any other alternative") must be supported by reliable and competent evidence, demonstrating that the product can perform as claimed. The Federal Trade Commission's ("FTC") standard of competent and reliable scientific evidence has been defined in FTC case law as "tests, analyses, research, studies, or other evidence based on the expertise of professionals in the relevant area, that has been conducted and evaluated in an objective manner by persons qualified to do so, using procedures generally accepted in the profession to yield accurate and reliable results."<sup>1</sup>

Here, Max International acknowledged that the product performance claims were improper and did not attempt to provide evidentiary support for the statements at issue. Accordingly, DSSRC determined that the Company's removal of the two posts was necessary and appropriate.

Based on the Company's prompt response and the removal two health-related claims at issue in this inquiry, DSSRC administratively closed this inquiry.

(Case No 68-2022. Closed on 4/5/2022)

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<sup>1</sup> See, e.g. *Vital Basics, Inc.*, C-4107 (Consent April 26, 2004); see also *In Re Schering Corp.*, 118 F.T.C. 1030, 1123 (1994).