

BBB NATIONAL PROGRAMS
THE DIRECT SELLING SELF-REGULATORY COUNCIL

OPULENCE GLOBAL

Case No. 74-2022
Filed June 27, 2022

ADMINISTRATIVELY CLOSED

I. Company Description

Opulence Global (the “Company”) is a multi-level direct selling company located in Ontario, Canada that sells skincare, personal care, and health & wellness products. One of the Company’s signature products is its Fountain of Life, an antioxidant that includes a Picea Abies extract as one of its primary ingredients.

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.

This inquiry concerns product and earnings claims disseminated by the Company’s salesforce members. The representative claims that formed the basis of this inquiry were located on social media accounts of Company salesforce members. Those claims are set forth below:


A. Earnings Claim

- “Have your finances taken a hit due to Covid-19 [...] build an extra revenue stream”

B. Product Claims

- “... Boost my immune system and better protect myself from Covid-19”
- “Anti-Inflammatory
 - Protect Prostate Health
 - Controls Diabetes Complications
 - Reduce Breast Cancer
 - Reduce Colon Cancer Risk
 - Reduce Hot Flashes
 - Defense Against Dementia

- Improve Hair Health
- Improve Metabolism
- Antimicrobial
- Protects DNA”
- “30 plus drops a day of Fountain of life will ... boost your immune system and to fight against pathogens like the coronavirus”

 **Opulence Global Philippines**
March 6, 2020 · 🌐

Those with compromised immune systems caused by disease and age are the group most affected by the novel corona virus.

Long-term inflammation lowers our immune system as free radicals reduces the structural integrity of our cells and tissues.

30 plus drops a day of Fountain of Life will quickly enter our system to lower oxidative stress and boost our immune system to fight against pathogens like the coronavirus.

Simple, yet effective, Fountain of Life is your immune system booster.

- From the desk of David O.

[#FountainOfLife](#) [#FOL](#) [#immunesystem](#) [#healthbooster](#) [#health](#) [#lignans](#) [#freeradicals](#) [#virus](#) [#coronavirus](#) [#covid19](#) [#fluseason](#) [#protectyourwellbeing](#) [#wellbeing](#)


FROM THE DESK OF
DAVID O.
FOUNTAIN OF LIFE PRODUCT EXPERT

Those with compromised immune systems caused by disease and age are the group most affected by the novel corona virus.

Long-term inflammation lowers our immune system as free radicals reduces the structural integrity of our cells and tissues.

30 plus drops a day of **Fountain of Life** will quickly enter our system to lower oxidative stress and boost our immune system to fight against pathogens like the coronavirus.

Simple, yet effective, **Fountain of Life** is your immune system booster.



III. Company's Position

The Company stated that it appreciated DSSRC bringing the four social media posts to its attention.

The Company noted that all four of the posts originated outside of the United States. The Company did not attempt to substantiate the three product performance claims

at issue. After receiving a copy of DSSRC's inquiry, Opulence Global immediately contacted the salesforce members responsible for the posts and effectuated the removal of the three product claims.

With respect to the earnings claim at issue, the Company stated that many businesses and employees have been negatively impacted by COVID-19 and that the post was simply intended to present an opportunity to people who may be seeking a new source of income. Notwithstanding, the Company was able to contact the salesforce member who was responsible for disseminating the claim and have the post modified to eliminate any reference to COVID-19.

IV. Analysis and Recommendation

DSSRC appreciated the good faith efforts of Opulence Global to address its concerns in this inquiry.

DSSRC determined that the actions taken by the Company were necessary and appropriate. The Company chose not to attempt to support the performance claims communicated in the social media posts before DSSRC and, instead, effectuated their discontinuance.

As DSSRC has noted in several previous inquiries¹, health-related claims 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".²

Regarding the one earnings claim at issue, DSSRC was concerned that the claim could reasonably be interpreted by consumers as meaning that the Company's business opportunity could be an optimal way to recoup income lost due to the pandemic. Accordingly, DSSRC shared the concerns expressed by the FTC about advertising claims made by direct selling companies referencing the earnings that people have lost as a result of the pandemic.³ Although Opulence Global disagreed with DSSRC's interpretation of this claim, it nevertheless modified this social media post in the spirit of voluntary self-regulation, more specifically, by removing any reference to COVID-19.

¹ See DSSRC Case #63-2022 –Innov8tive Nutrition; DSSRC Case #68-2022 – Daxen, Inc.; DSSRC Case #69-2022 – Max International, LLC

² 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).

³ <https://www.ftc.gov/news-events/news/press-releases/2020/04/ftc-sends-warning-letters-multi-level-marketers-regarding-health-earnings-claims-they-or-their>

Based upon the bona fide, good faith actions taken by Opulence Global to contact its salesforce members and reconcile the posts at issue, DSSRC administratively closed its inquiry.

(Case No. 74-2022, closed on June 27, 2022)

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