

BBB NATIONAL PROGRAMS

THE DIRECT SELLING SELF-REGULATORY COUNCIL

MWR LIFE, LLC,
Corporation.

Case No. 87-22
Filed 10/11/22

MONITORING INQUIRY

I. Company Description

MWR Life, LLC. (“MWR Life” or the “Company”) is a multi-level direct selling company headquartered in Fort Lauderdale, Florida that offers discounts on travel services such as flights, hotels, resorts, cruises, vacation rentals, car rentals, excursions, theme parks, and trains.

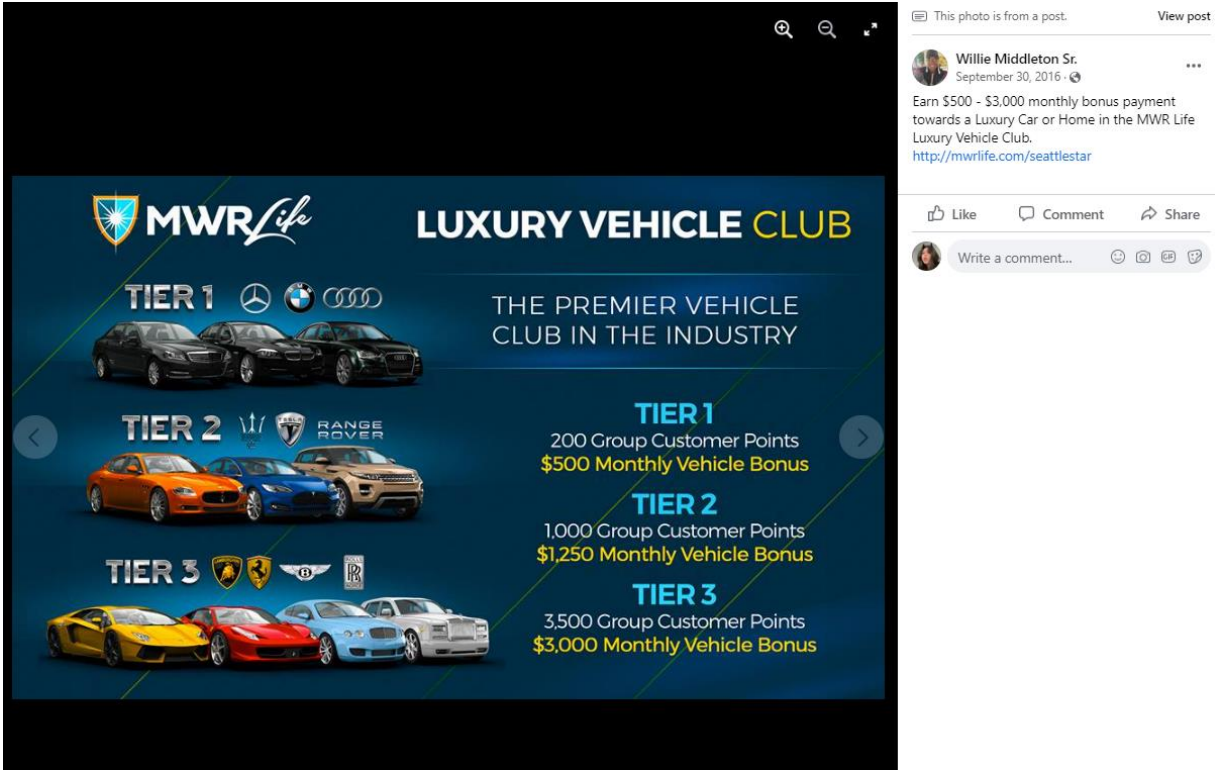
II. Basis of Inquiry

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 earnings claims disseminated by MWR Life salesforce members on social media. Those claims are set forth below:

- “This Platform is to help you obtain Financial Freedom...#ExoticCars”
- “MWR Life provides the key to realizing your potential, living a better lifestyle and achieving financial freedom! #financialfreedom”
- “Can you use an extra \$500 added to your household every month?
 - Our company MWR Life GUARANTEES you \$500 per month, EVERY month!
 - \$1000 MONTHLY LUXURY CAR BONUS
 - \$3000 MONTHLY LUXURY HOME BONUS
 - \$500 MONTHLY HEALTH & LIFE INSURANCE PAYMENT
 - \$300 - \$100,000 FREEDOM BONUSSES
 - FOUNDER QUARTERLY PROFIT SHARING
 - CUSTOMER RESIDUAL INCOME
 - TEAM CUSTOMER RESIDUAL INCOME
 - TEAM EXPANSION BONUSSES PAID DAILY
 - BONUSSES
 - WORLD CLASS TRIPS & RECOGNITION”

- Image of MWR Luxury Vehicle Program and luxury cars with copy stating “Earn \$500 - \$3,000 monthly bonus payment towards a Luxury Car or Home in the MWR Life Luxury Vehicle Club”



- “I also had a hard time believing it until I started earning income 🤖 ✅ Want to earn a daily income?”
- “A member of the club, with the help of his team, earns an average of \$2,400 a month after 2 months of activity, and after 4 months his earnings are up to \$4,500 and more.”
- “Earn up to \$15,000 daily in residual income with MWR life, while traveling the world for free! #unmatchedincomepotential”
- “Make Wealth Real – MWR Life offers 10 Essential Consumer Services. You can finally live the LIFESTYLE you want and earn a 6 figure residual yearly income. You get the following bonuses EVERY MONTH from Make Wealth Real – MWR Life:

** \$5 - \$1,000+ DAILY PAY
 \$500 - \$3,000 on a Luxury Car & Home Bonus
 \$1,000 Instant Bonus
 \$500 Travel Bonus to travel the world.
 \$250 Shopping Bonus

\$100 dollars to go shopping for food.
 \$250 - \$500 Consumer
 Sign-Up Bonus. MWR Life Page 4 5.27.2022 - Join Now”

Willie Middleton Sr.
 September 30, 2016 · 🌐

Make Wealth Real - MWR Life offers 10 Essential Consumer Services. You can finally live the LIFESTYLE you want and earn a 6 figure residual yearly income. You get the following bonuses EVERY MONTH from Make Wealth Real - MWR Life:

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- * \$1,000 Instant Bonus
- * \$500 Travel Bonus to travel the world.
- * \$250 Shopping Bonus
- * \$100 dollars to go shopping for food.
- * \$250 - \$500 Consumer Sign-Up Bonus.

Join now!!
<http://makewealthreal.com/seattlestar>

- “Plus every membership on your team helps you qualify for a residual income. Just imagine to receive life changing residual income every single week by helping people save money and travel ... MWR Life allows you to increase your income right away by harnessing the power of leverage and helps you create freedom with residual income.”



MWR MWR Life Presentation Video

20 views Sep 9, 2016 Andre Smith is a Leader in MWR Andre is a 24 year old young man based out of Miami, FL. He is a Network marketer and has a great team based attitude. He has a vision to change the world, beginning with one person at a time. Directing each and every one of them to the road to Financial and Time Freedom.

👍 0 🗑 Dislike ➦ Share ⬇ Download 🗂 Clip ⌵ Save ...

- “...you can have a business with unlimited income potential”
- “I can show you how to turn \$35 investments with MWR Life into a lifetime residual income with travel. This isn’t a travel agent opportunity! You earn money by simply sharing travel discount passes with your friends and family.”
- “Make residual income your reality”
- “We will pay you \$500 a month guaranteed. That’s six thousand dollars a year in residual income.”
- “Thrilled and honoured to have reached the third level in MWR Life’s compensation last night. Fun, travel, and financial freedom another step close”
- “You are REPRESENTATIVE being paid passive income”
- “POSSIBILITY TO CREATE PERSONAL MONTHLY INCOME TO GET THE FINANCIAL FREEDOM AND COLLABORATE TO PEOPLE LIVING ALL OVER THE WORLD!!”
- “The power of #ResidualIncome. Contact a Lifestyle Consultant to learn how MWR Life can help you create residual income.”
- “Bringing amazing extra earning potential, bonuses and residual income, again full trainings and support offered”

- “Never thought I would be able to retire. MWR Life has allowed me to go into semi-retirement and very surely it’s going to be full retirement.
- “Amazing services and a great opportunity to earn full time or part time income working from home”
- “Would you like to travel at a very reduced price saving up to a 80% and have financial freedom?”

III. Company’s Position

MWR stated that it supports the efforts to promote an effective culture of self-regulation in the direct selling business industry. MWR noted that it has developed comprehensive policies and procedures aimed to ensure that its business practices and the marketing practices of MWR’s business partners (“Ambassadors”) adhere to all applicable laws and regulations, including industry-specific FTC guidelines.

The Company provided DSSRC with a copy of MWR Life’s Policies and Procedures which articulated the code of conduct expected from Company Ambassadors.¹

In addition to incorporating all the terms of the Policies in the contract, MWR Life’s Policies and Procedures contain obligations on how to present the company’s business opportunities and how to sell the services. MWR stated that it periodically requests Ambassadors to remove content that may be considered misleading or in violation of MWR’s policies and conducts weekly training sessions covering several aspects of compliance, including observance of marketing and advertisement practices under the Policies, industry standards, and applicable regulations.

The Company informed DSSRC that it devotes significant resources to continually monitoring marketing materials, claims, social media activity, etc. and that when the Company identifies non-compliant claims, the procedures stated in the Policies are applied, which may include a petition for removal.

With respect to the social media posts identified by DSSRC, MWR indicated that it attempted to contact the active and inactive MWR Ambassadors responsible for the social media posts at issue and requested the removal of the identified posts.

¹ For example, Section 4.4(A) of MWR Life’s Policies and Procedures, which contains the Web Policy of the Company, establishes an obligation on the Ambassadors “to ensure your online marketing activities are truthful, are not deceptive, and do not mislead customers or potential Independent Lifestyle Ambassadors in any way. Websites and web promotion activities and tactics that mislead or are deceptive, regardless of intent, will not be allowed.”

The Company provided DSSRC with a detailed spread sheet detailing each social media post, the status of MWR's removal request, hyperlinks of MWR's removal requests screenshots, and the status of MWR's reports to the corresponding website.

The Company confirmed that almost half of the posts brought to its attention by DSSRC have been removed. MWR Life noted that almost all the remaining posts were disseminated prior to 2020 by salesforce members who are no longer active with the Company and that, additionally, any of the posts that were identified by DSSRC from active MWR Life Ambassadors have been removed.

MWR stated to DSSRC that it devotes significant resources to continually monitoring marketing materials, claims, and social media activity and will continue to monitor the status of the takedown requests and provide updates to DSSRC.

IV. Analysis and Recommendation

DSSRC confirmed that MWR removed 10 of the 24 social media posts brought to its attention in this inquiry and expressed its appreciation to the Company for its bona fide good faith efforts to remove the posts at issue.

As stated in DSSRC's Guidance on Earnings Claims for the Direct Selling Industry ("the Guidance"), while DSSRC will evaluate any claim based upon the context in which the claim appears and the potential net impression of such claim to the audience, some words and phrases commonly used in earnings claims can carry a particularly substantial risk of being misleading to consumers. Such words and phrases include claims such as "financial freedom," "full-time income," "replacement income," "residual income," and "career-level income." Furthermore, earnings claims must be substantiated and representative of a level of earnings that can be generally expected by the audience.

When a direct selling company such as MWR Life is made aware of an improper product or income claim that was made by an individual that was an active distributor when such claim was made but that has since become an inactive distributor of the company, DSSRC acknowledges that the direct selling company may not be able to require the former distributor to remove such claim. In that instance, DSSRC nonetheless recommends that the direct selling company make a bona fide, good faith effort to have the improper claim or post removed. DSSRC determined that the Company's actions to request the removal of claims communicated by the inactive salesforce members would constitute a bona fide good faith attempt with respect to removing improper claims made by distributors that have since become inactive distributors. While DSSRC recognized that most of the remaining posts were made prior to 2020, it was noted that the inappropriate earnings claims remain accessible by consumers and, thus, concluded that the

ongoing efforts by the Company to facilitate removal of the posts is necessary and appropriate.

DSSRC also notes that if the social media platform where the subject post was made provides a mechanism for reporting trademark or copyright violations, DSSRC recommends that the direct selling company promptly utilize such mechanism and seek removal of the subject claims and posts. If the subject claim that came to the attention of the direct selling company occurred on a website or platform without a reporting mechanism, DSSRC recommends that in addition to contacting the former salesforce members in writing as described above, the Company should also contact the website or platform in writing and request removal of the subject claim or post.

Accordingly, while DSSRC appreciates the genuine efforts of MWR Life to contact the active and inactive Ambassadors who were responsible for the posts to have the claims removed, the Company should determine if the social media platforms where the posts appear have a reporting mechanism for intellectual property violations and, if so, it is recommended that MWR Life contact the platform in writing and request removal of the remaining social media posts.

V. Conclusion

DSSRC confirmed that MWR removed 10 of the 24 social media posts brought to its attention and determined that the Company's actions requesting the removal of claims communicated by both active and inactive salesforce members would constitute a bona fide good faith attempt with respect to removing improper claims. DSSRC recognized that most of the remaining posts were made prior to 2020, however, because the inappropriate earnings claims remain accessible by consumers it was concluded that the ongoing efforts by the Company to facilitate removal of the posts was necessary and appropriate.

Lastly, it was recommended that the Company determine if the social media platforms where the posts appear have a reporting mechanism for intellectual property violations and, if so, MWR Life should contact the platform and request removal of the remaining social media posts.

VI. Company Statement

“MWR Life has quickly acted and will continue to take action on activities of concern raised by the DSSRC by reaching out to salesforce members responsible for unauthorized posts or, when appropriate, by contacting the platform where the claim was disseminated to request the removal of the post.

MWR Life has already succeeded in having ten claims at issue removed from circulation and continues its efforts to remove the remaining posts. MWR Life will update DSSRC about the Company's efforts to remove the remaining posts that were the subject of this inquiry.”

(Case No. 87-22, closed on 10/11/22)
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