



TLC

TOTAL LIFE CHANGES®

HEALTH & PRODUCT CLAIMS

WHAT IS PERMITTED? WHAT IS PROHIBITED?

DIRECT SELLING

KEY REGULATORY BODIES/WATCHDOG GROUPS

- Federal Trade Commission (FTC)
- Food and Drug Administration (FDA)
- Direct Selling Self-Regulatory Council (DSSRC)
- State Attorneys General (AG)
- Local Better Business Bureau (BBB)
- TruthInAdvertising.org (TinA)

FTC GUIDANCE ON HEALTH CLAIMS

- Whether *express or implied*, any advertising, including social media posts and videos, must be truthful and not misleading.
- Advertising must have “adequate substantiation” for all objective product claims.
- The advertisement is looked at as a whole to determine whether it will mislead a consumer, acting reasonably under the same circumstances.

TLC POLICIES & PROCEDURES §7.2

7.2 Product Claims

LCs must not make any claims, including personal testimonials, as to therapeutic, curative or beneficial properties of any TLC products separate from those TLC has approved, as identified in the product fact sheet called “Facts You’ll Feel” or “FYF”. In particular, no LC may make any claim that TLC products are useful in the cure, treatment, diagnosis, mitigation or prevention of any diseases or signs or symptoms of a disease. Not only do such claims violate TLC policies, but they potentially violate applicable laws, including, but not limited to, the Federal Food, Drug, and Cosmetic Act and Federal Trade Commission Act. When speaking about TLC’s products, an LC should always disclose his or her relationship with TLC through a hashtag (e.g., “#TLCLifeChanger”), or other statement. LCs should be honest in their testimonial personal experience and assert that they are not claiming that their experience is the typical result experienced by consumers. Such testimonials should be accompanied by a disclaimer indicating that any claimed results are not typical, and disclosing the typical results with regard to the product as established in TLC’s FYF. Unless specifically warranted in the FYF LCs must not guarantee any results from the use or consumption of TLC products and services.

TLC'S ADVERTISING POLICY - PRODUCTS

- Only make the claims TLC has approved for a particular product. Just because a product had a result for you, doesn't mean that others will have the same result. So, while it may be tempting to be more creative with product claims, it is important that you stick to the guidance to make sure you are making truthful and non-misleading claims.
- Consider the net impression or takeaway message of the claim. Think about the whole context of the claim, including words, hashtags, and pictures. If a reasonable consumer would take away a misleading message (for example, that a product can treat a disease or other health condition), then you must change the claim.
- Include the following disclaimer whenever you make a claim about any of TLC's supplement products, on any platform, in a place that people can easily see and understand it:

This statement has not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure, mitigate or prevent any disease. Not intended for use by children. If you are pregnant, nursing or taking medications, consult your physician prior to use.

ADEQUATE SUBSTANTIATION OF HEALTH CLAIMS

- “Adequate Substantiation” is a flexible standard that generally requires health claims to be supported with competent and reliable scientific evidence.

DOES THE POST AS A WHOLE MAKE A HEALTH CLAIM

- You are responsible for the “net impression” of the advertisement.
- If the post gives the overall impression that the product treats, cures or prevents disease, it is an **IMPROPER** CLAIM.

NATURAL VS. ORGANIC

- Just because something is natural does not mean it is organic. If it is not labeled “Organic,” you cannot claim it is organic.
- For a product to be considered natural, it must be derived from nature and the ingredients must have undergone a minimal amount of processing.
- A product can also be considered “natural” but not “100% natural” or “all natural” as long as the claim is qualified, such as “no artificial preservatives” or “all natural flavors.”
- By contrast, organic claims are highly regulated by the US Department of Agriculture (USDA) in regards to certification, pesticide and fertilizer use, and more.
- Given the increased plaintiff litigation regarding “natural” and “all natural” claims and heightened regulatory scrutiny of any reference to “organic” in a product claim, we recommend you **DO NOT** make any reference to “natural” or “organic” in any product ad.

WORDS THAT REQUIRE CERTIFICATION

- In addition to 'Natural' and 'Organic', there are several other claims that require proper certification. Although certain TLC products have such certification, given the increased plaintiff litigation regarding these terms, we recommend you **DO NOT** make any reference to the following terms in any product ad:
 - Gluten-free, Halal, Kosher, Non-GMO, Sugar-Free, Vegan
- For a product to be considered 'Gluten-Free' it must contain less than 20 parts per million (ppm) of gluten
- For a product to be considered 'Halal' it must not contain, pork, alcohol, or products from animals not slaughtered under Islamic consumption practices
- For a product to be considered 'Kosher' it must be produced in an audited facility using ingredients manufactured and processed according to stringent requirements regarding product handling, manufacturing, and cleaning
- For a product to be considered 'Non-GMO' every ingredient must be obtained from a non-genetically modified organism source
- For a product to be considered 'Sugar-Free' one serving must contain less than 0.5 grams of sugar, both natural and added
- For a product to be considered 'Vegan' it may not be of animal origin, and at no stage of the production and processing can there be the use of or supplementation with any animal ingredients, substrates, processing aides or other substances of animal origin in processed or unprocessed form

IMPROPER SOCIAL MEDIA POSTS

Health and Wellness (Detox)



**9 POWERFUL HERBS
for your LIFE!!**



- ✓ **Filters:**
Toxins, Chemicals, Hormones and Pesticides in the Food we eat and in the Air we breath.
- ✓ **Detox**
Removes the Parasites, Intestinal Sludge, any type of waste that causes your body to become sick and unhealthy.
- ✓ Cleanses and Purifies your **Organs**
- ✓ Cleanses and Purifies your **Blood**
- ✓ Cleanses and Purifies your **Digestive Tract**
- ✓ Purifies your **Respiratory System**
- ✓ Purifies your whole **Body**

* To OPTIMIZE YOUR HEALTH, it is IMPORANT TO DRINK IASO TEA DAILY!!

Great for IBS, Bloating & Pain

Incorrect Product Claims:

- Detox
- Filters toxins, chemicals, hormones and pesticides
- Removes parasites, intestinal sludge, any type of waste that causes your body to become sick and unhealthy
- Cleanses and Purifies
 - Your organs
 - Your blood
 - Your digestive tract
 - Your respiratory system
 - Your whole body
- Great for IBS, Bloating & Pain

IMPROPER SOCIAL MEDIA POSTS



**PIERDE 5 LIBRAS
EN 5 DÍAS**
**DESINTOXÍCATE
Y PIERDE PESO NATURALMENTE**
CON **Iaso Tea**
100 % ORGÁNICO

TAMBIÉN AYUDA CON:

- ESTREÑIMIENTO
- ELIMINA LOS PARÁSITOS
- INFLAMACIÓN
- ALTA PRESIÓN
- ALTO COLESTEROL
- DIABETES
- LIMPIA EL COLON
Y MÁS...

Iaso Tea ORIGINAL
Makes 1 Gallon of Herbal Tea
2 TEA BAGS
NET WT. 0.2 oz.

TOTAL LIFE CHANGER
LIFE CHANGER


Incorrect Product Claims:

- Lose 5 lbs in 5 days
- Detox and lose weight naturally
- 100% Organic
- Also helps with
 - Constipation
 - Eliminates parasites
 - Inflammation
 - High blood pressure
 - High cholesterol
 - Diabetes
 - Cleans the colon

RESPONSIBLE SOCIAL MEDIA POSTING


- There is a lot of unapproved and incorrect material on social media.
- Don't copy & paste or share any posts you find online that do not comply with TLC's advertising policy or contain questionable health or product claims
- Only share material that has been created or approved by TLC, as shown on the product fact sheets called "Facts You'll Feel" or "FYF" found for each product on TLC's corporate website under "Products". These claims should also include the FDA DHSEA disclaimer (e.g., <https://totallifechanges.com/facts-youll-feel-watermelon-iaso-instant-tea/>).

PROPER SOCIAL MEDIA POST

**TLC Compliance**
Published by [REDACTED] · Just now ·


My friend introduced me to this tea and I've been drinking it for the past two weeks. It's easy to make and easy to take. Since I've been drinking it, I have more energy during the day because I've been sleeping better at night. I also feel less sluggish and bloated. I'm so excited to see what happens next!

****This statement has not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure, mitigate or prevent any disease. Not intended for use by children. If you are pregnant, nursing or taking medications, consult your physician prior to use.**



Ingredients

- Senna Leaves (*Cassia angustifolia*)
- Papaya Leaves (*Carica papaya*)
- Chamomile Flower (*Matricaria recutita*)
- Persimmon Leaves (*Diospyros kaki*)
- Malva Leaves (*Malva verticillata*)
- Organic Ginger Root (*Zingiber officinale*)
- Marshmallow Leaf (*Althaea officinalis*)
- Blessed Thistle Herb (*Cnicus benedictus*)
- Myrrh Gum (*Commiphora myrrha*)



Supplement Facts
(Serving Size: 1 Packet)
(Servings Per Packet: 16)

Amount Per Serving	% Daily Value
Iaso! Regular Brewed Tea Proprietary Blend 3000 mg	100%
Senna Leaves (<i>Cassia angustifolia</i>)	100%
Papaya Leaves (<i>Carica papaya</i>)	100%
Chamomile Flower (<i>Matricaria recutita</i>)	100%
Persimmon Leaves (<i>Diospyros kaki</i>)	100%
Malva Leaves (<i>Malva verticillata</i>)	100%
Organic Ginger Root (<i>Zingiber officinale</i>)	100%
Marshmallow Leaf (<i>Althaea officinalis</i>)	100%
Blessed Thistle Herb (<i>Cnicus benedictus</i>)	100%
Myrrh Gum (<i>Commiphora myrrha</i>)	100%

(Daily Value not established)

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Not intended for use by children. If you are pregnant, nursing, or taking medications, consult your physician prior to use.

This product is a dietary supplement. It is not a drug. It is not intended to be used as a substitute for a meal. It is not intended to be used as a substitute for a meal. It is not intended to be used as a substitute for a meal.

STORE IN A COOL, DRY PLACE AWAY FROM HEAT AND LIGHT.

About Iaso! Original Brew Tea
Beloved around the world, Iaso! Original Brew Tea is a powerful herbal blend that provides a gentle cleanse to aid your weight management goals.

HOW TO MAKE:
STEP 1: DRINK (1) Pour water to **ROLLING BOIL**.
STEP 2: ADD (2) two bags and **COVER**. Simmer 10 min. and let steep for 4-6 hours.
STEP 3: CONSUME STEEPED tea with (2) Quarts cold water to make (2) gallons of tea and **REFRIGERATE**.

SUGGESTED USE:
Adults drink an 8-oz glass with lunch & dinner and a 4-oz glass with an evening snack. May be consumed morning, afternoon, and night.

INGREDIENTS:

- Senna Leaves (*Cassia angustifolia*)
- Papaya Leaves (*Carica papaya*)
- Chamomile Flower (*Matricaria recutita*)
- Persimmon Leaves (*Diospyros kaki*)
- Malva Leaves (*Malva verticillata*)
- Organic Ginger Root (*Zingiber officinale*)
- Marshmallow Leaf (*Althaea officinalis*)
- Blessed Thistle Herb (*Cnicus benedictus*)
- Myrrh Gum (*Commiphora myrrha*)

- ✓ Highlights how consumer feels
- ✓ Does not mention any disease or medical condition
- ✓ Includes information from “Facts You’ll Feel”
- ✓ Includes the FDA DHSEA disclaimer and other applicable disclaimers.

HEALTH CLAIMS THAT MISLEAD BY OMISSION

- Posts can be deceptive for what they fail to say as well.
- Must disclose any limitations or qualifying information to prevent the post from being misleading.
- Disclaimers are frequently used to protect against omissions claims – the FTC sometimes refers to these types of disclaimers as “qualifying information.”
- IMPROPER Misleading Example : *I drank Iaso Tea for six weeks and at my next doctor's appointment, I found my cholesterol was down 20 points.*
- PROPER Qualified Example : *I drank Iaso Tea for six weeks, ate a healthy, low-fat diet and increased my exercise, and at my next doctor's appointment, I found my cholesterol was down 20 points.**

**This statement has not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure, mitigate or prevent any disease. Not intended for use by children. If you are pregnant, nursing or taking medications, consult your physician prior to use.*

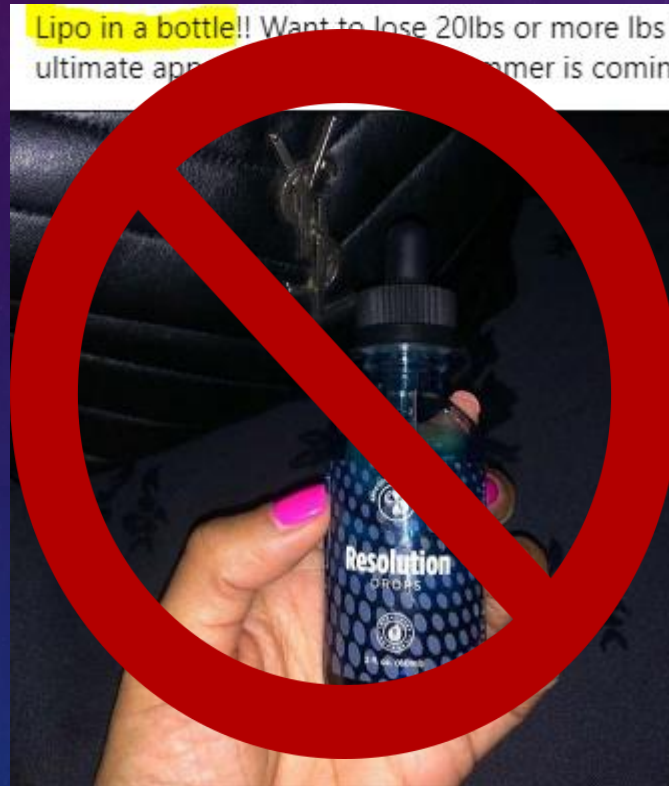
PUFFERY

- Puffery is defined as a statement or opinion that is either so hyperbolic, exaggerated or vague that no reasonable person would take it seriously, or it is incapable of being objectively proven.
- Often used as a slogan, catchphrase or tagline for a product.
- Examples:



PUFFERY (CONT.)

- Problems arise when the catchphrase makes a health claim that a typical consumer may believe to be true.
- Example:



HEALTH CLAIMS BASED ON PERSONAL EXPERIENCE

It does not matter that your testimonial represents your own personal experience and honest opinion.

- Anecdotal evidence of the product's effect, based solely on the experiences of the individual, is not sufficient to substantiate a claim.
- Disclaimers regarding what the typical consumer can expect, supported by evidence, are necessary with all testimonials.
- Proper Example Testimonial:

*"After drinking Iaso Tea for a week, I feel like I have more energy and I am sleeping better. My experience may not be typical of all users of Iaso Tea. You should always consult with a physician before using any dietary supplement."**

**This statement has not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure, mitigate or prevent any disease. Not intended for use by children. If you are pregnant, nursing or taking medications, consult your physician prior to use.*
- Even if your testimonial is based on your personal experience as a consumer, if your affiliation as an LC with TLC is not clear from the ad, it may be necessary to disclose that you are also being compensated as an LC.

HEALTH CLAIMS BASED ON TRADITIONAL USES

- Some claims based on the traditional use of the product, or an ingredient, for a particular purpose are permitted because it is a long-standing, scientifically-proven fact.

Proper Example: *Calcium builds strong bones.*

- When analyzing traditional use claims, the FTC examines:
 - Consumers' expectations that the claim be backed up by scientific evidence
 - Whether the claim implies that the supplement or an ingredient has been scientifically evaluated for efficacy
 - Whether the historical use of the supplement or ingredient can be documented and supported
 - Will the claim at issue lead a consumer to self medicate or forego treatment of a potentially serious condition.

HEALTH CLAIMS BASED ON TRADITIONAL USES (CONT.)

- Other claims based on the traditional use of the product or an ingredient for a particular purpose are more troublesome.

Improper Example: *The Ganoderma lucidum fungus has a long history of use for promoting health and longevity in China, Japan, and other Asian countries.*

- Although, studies have been done and additional studies are ongoing, the results, to this point, have been inconclusive.
- Unfortunately, that has not stopped companies and individuals from making improper health claims about the potential benefits of this mushroom, like “cancer-fighting” or “immune-boosting” properties.
- Unless indicated on TLC’s Product Fact Sheet (FYF), **DO NOT** make health claims based on traditional uses.

HIGH-RISK WORDS AND PHRASES

➤ Alleviate	➤ Diagnose	➤ Insulin	➤ Sick/Sickness
➤ All Natural	➤ Disease(s)	➤ Kill(s)	➤ Severity
➤ Antibacterial	➤ Disorders(s)	➤ Kosher	➤ Stimulate
➤ Anti-Depressant	➤ Drug(s)	➤ Menopause	➤ Stimulation
➤ Anti-Inflammatory	➤ Dysfunction(s)	➤ Mitigate(s)	➤ Sugar-Free
➤ Anti-Hypercholesterolemic	➤ Fat Levels	➤ Mood Swings	➤ Shrinks
➤ Anti-Microbial	➤ Fight(s)	➤ Muscle Functions	➤ Sick
➤ Antiviral	➤ Flare/Flare Ups	➤ Natural	➤ Sickness
➤ Anxiety	➤ Glucose-Free	➤ Nerves from Injury	➤ Stiffness
➤ Arthritis	➤ Gluten-Free	➤ Nerve Functions	➤ Swelling
➤ Autoimmune	➤ GMO	➤ Neuroactive	➤ Stop
➤ Boost(s)	➤ Halal	➤ Neuro	➤ Stop suffering
➤ Blood Cells	➤ Harmful Toxins	➤ Neuroprotective Properties	➤ Sugar free
➤ Blood Pressure	➤ Heal(s)	➤ Non-GMO	➤ Symptoms
➤ Blood Sugar	➤ Healing	➤ Organic	➤ Time off work
➤ Burn Fat	➤ Help	➤ Pain	➤ Tissue
➤ Certified	➤ Heart	➤ Prevent(s)	➤ Treat(s)
➤ Certified Organic	➤ Heart Disease	➤ Preventative	➤ Treatment(s)
➤ Cardiovascular	➤ Hopeless	➤ Protect	➤ Tumors
➤ Cardioprotective	➤ IBS	➤ Reduce(s)	➤ Type A
➤ Cholesterol	➤ Ill/Illness	➤ Reduction	➤ Type B
➤ Cure(s)	➤ Improve(s)	➤ Relief	➤ Vegan
➤ Covid/Covid-19	➤ Immune System	➤ Relieve(s)	➤ Vitiligo
➤ Depression	➤ Immunity	➤ Restore(s)	➤ Whole Grain
➤ Detox	➤ Infection(s)	➤ Restore to health	➤ Wound(S)
➤ Diabetic	➤ Inflammation	➤ Risk	➤ 100% Organic
➤ Diabetes	➤ Inflammatory		

TLC'S CURRENT GUIDANCE

Product/Medical Claims

It is important to be mindful of medical claims when advertising products. Here are some alternatives for consideration to be sure you are following compliance guidelines when promoting products.

Avoid These Terms	Try These Instead!
Diabetes	Helps support already healthy blood sugar levels
Heart Attack	Supports optimal cardiovascular health or function
Arthritis	Joint discomfort or stiffness associated with over use or over-exertion, helps support cartilage and joint function
Obesity	Aids in weight loss
Cancer Prevention of Cancer Prevention of Disease(s) Kills Cancerous Cells	Supports optimal immune function or helps maintain a healthy immune system
Chronic Fatigue	Supports healthy energy levels
Cholesterol	Supports healthy cholesterol levels or helps maintain already healthy cholesterol levels
Prevents Development of Cancer	Helps promote optimal cellular health and functionality
Depression	Promotes or maintains normal or stable mood

- **DO NOT** make any claims, including personal testimonials, as to therapeutic, curative or beneficial properties of any TLC products separate from those TLC has approved, as identified in the Product Fact Sheet called "Facts You'll Feel" or "FYF".

KEY TAKEAWAYS

- ✓ **DO** only use scientifically-based evidence to support any claims made in advertising.
- ✓ **DO** refer to the Product Fact Sheet called “Facts You’ll Feel” or “FYF” for product benefits, ingredients, use instructions and related disclaimers.
- ✓ **DO** evaluate the post as a whole to make sure its “net impression” is not misleading.
- ✓ **DO NOT** make any claims that a product may help any serious or life-threatening conditions.
- ✓ **DO NOT** make any statement, including testimonials, that indicate that a product may diagnose, cure, treat, mitigate or prevent any disease.
- ✓ **DO** liberally use the standard FDA disclaimer that the product is not intended to diagnose, treat, cure, mitigate, or prevent any disease.