



UNITED STATES OF AMERICA
Federal Trade Commission
WASHINGTON, D.C. 20580

June 5, 2020
Via Electronic Mail

Youngevity International, Inc.
c/o Stephen Wallach, CEO
2400 Boswell Rd.
Chula Vista, CA 91914

Warning Regarding Health Claims Related to Coronavirus Disease 2019 (COVID-19)

Dear Mr. Wallach,

FTC staff has reviewed Youngevity International, Inc.'s ("Youngevity") corporate website and social media posts by Youngevity business opportunity participants or representatives that unlawfully advertise that certain products treat or prevent Coronavirus Disease 2019 ("COVID-19"). This letter is to provide you with information about laws and regulations enforced by the FTC that may bear upon your business activities, including the activities of your business opportunity participants and representatives.

An example of a health claim made on your corporate website is:

- "#FlattenTheCurve Shop Immune Support" (clicking on "Shop Immune Support" redirects to a page displaying various Youngevity "immune support" products for sale)

Some examples of health claims made by your business opportunity participants or representatives include:

- "Vaccines and Trick or Treat Medicine. The desire to trick the body rather than support the body. The desire to treat the body, rather than support the body's ability to heal. Before I go on a Covid-19... talk... It is always better to be prepared. Preparation is everything. Let's not allow them to allow more Americans to die needlessly.... So since most people are over 150 pounds, anyone who has Covid-19 should have: 1 Healthy Bran and Heart Pak [link to distributor sales page] 1 Healthy Bone and Joint Pak [link to distributor sales page] 1 Immunity Health Pak [link to distributor sales page] With these, your body will be able to withstand and eliminate Covid-19 and the vaccines forthcoming for Covid-19. Also get your Rebound FX – Stay Safe. #youngevity #flattenthecurve #covid19 #coronavirus"
- Speaker describes dangers of coronavirus and panic it has caused and then states, "Y por eso, hemos hechado mano de los expertos, para que sean ellos quienes nos

den recomendaciones específicas de qué hacer y cómo hacerlo. Preguntamos al doctor y científico Joel Wallach, una persona que ha sido nominada a un premio Nobel, y que sus libros han sido distribuidos por todo el mundo. Él menciona de que las personas que hayan fallecido por causa de este virus son personas que tienen su sistema inmune muy bajo. Y es por eso que recomienda subir su sistema inmune, fortalecer sus defensas. Al preguntarle cómo lo hacemos, nos decía tres cosas muy importantes, a lo cual Ud. debe de tomar nota ahora mismo. Lo primero es eliminar la cantidad de suciedad o toxinas del cuerpo. [image of Youngevity Liver Pure supplements.] Significa hacerse una desintoxicación integral. Lo segundo: darle al cuerpo una nutrición correcta. Recuerde que cada una de nuestras células requiere cinco ingredientes principales para funcionar de manera óptima. Estos cinco ingredientes distribuidos [image of various Youngevity supplements] en noventa nutrientes esenciales. El doctor y científico Joel Wallach nos recomienda la famosa formula de “90 for life.” Y la tercera y más importante recomendación es que Ud. tome acción ahora mismo...”¹

It is unlawful under the FTC Act, 15 U.S.C. § 41 *et seq.*, to advertise that a product can prevent, treat, or cure human disease unless you possess competent and reliable scientific evidence, including, when appropriate, well-controlled human clinical studies, substantiating that the claims are true at the time they are made. For COVID-19, no such study is currently known to exist for the products identified above. Thus, any coronavirus-related prevention or treatment claims regarding such products are not supported by competent and reliable scientific evidence. You must immediately cease making all such claims.

You are responsible for the claims of your business opportunity participants and representatives. As the FTC stated in the January 2019 [Business Guidance Concerning Multi-Level Marketing](#), the compensation structure of a Multi-Level Marketing entity (“MLM”) may create incentives for its participants to make certain representations to current or prospective participants. “As a consequence, an MLM should (i) direct its participants not to make false, misleading, or unsubstantiated representations and (ii) monitor its participants so they don’t make false, misleading, or unsubstantiated representations.”

You are advised to review all claims relating to your business opportunity and immediately cease, and require your business opportunity participants and representatives to cease, making claims that are not supported by the evidence or substantiation described above.

¹ “And that is why we have reached out to experts, so that they can be the ones to give us specific recommendations on what to do and how to do it. We asked the doctor and scientist Joel Wallach, a person who has been nominated to a Nobel prize, and whose books have been distributed all over the world. He mentions that the people who have died because of this virus are people that have a very low immune system. And that is why he recommends to boost your immune system, strengthen your defenses. When asked how do we do this, he told us three very important things, of which you should take note right now. The first is eliminate the amount of dirt or toxins from the body. [image of Youngevity Liver Pure supplements.] This means to do a whole detoxification. The second: give the body the correct nutrition. Remember that each of our cells requires five principal ingredients to function in an optimal way. These five ingredients distributed [image of various Youngevity supplements] in ninety essential nutrients. The doctor and scientist Joel Wallach recommends to us the famous formula of “90 for life.” And the third and most important recommendation is that you to take action now.”

Within 48 hours, please send reply via email to COVID-19-Task-Force@ftc.gov describing the specific actions you have taken to address the FTC's concerns. If you have any questions regarding compliance with the FTC Act, please contact us at COVID-19-Task-Force@ftc.gov.

Sincerely,

Federal Trade Commission Staff